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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

YITZCHOK FRANKEL;
JOSHUA GHAYOUM; ~~and~~
EDEN SHEMUELIAN; ~~and~~
DR. KAMRAN SHAMSA,

Plaintiffs,

v.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA; MICHAEL V. DRAKE,
President of the University of California;
GENE D. BLOCK, former Chancellor,
University of California, Los Angeles;
DARNELL HUNT, Interim Chancellor &
Executive Vice-President and Provost;
MICHAEL BECK, Administrative Vice
Chancellor; MONROE GORDEN, JR., Vice
Chancellor; and RICK BRAZIEL, Assistant
Vice Chancellor, each in both his official
and personal capacities,

Case No. _____: 2:24-
cv-4702-MCS

**FIRST AMENDED
COMPLAINT**

JURY DEMAND

* Admitted pro hac vice ~~application for the coming~~ ‡ Not admitted to the D.C. Bar; admitted only in Texas. Supervised by licensed D.C. Bar members.

Defendants.

NATURE OF THE ACTION

1. The University of California, Los Angeles, once considered among the most prestigious public institutions in the world, has deteriorated into a hotbed of antisemitism. This rampant anti-Jewish environment burst into view on October 8, 2023, the day after Hamas terrorists attacked Israel in a harrowing rampage that saw over one thousand innocent Jews, including infants and the elderly, murdered, raped, and mutilated.

2. In the wake of these horrifying events, UCLA should have taken steps to ensure that its Jewish students and faculty were safe and protected from harassment and undeterred in obtaining full access to campus facilities. Instead, UCLA officials routinely turned their backs on its Jewish ~~students~~community, aiding and abetting a culture that has allowed calls for the annihilation of the Jewish people, Nazi symbolism, and religious slurs to go unchecked.

3. Matters turned especially ugly the following spring.

4. Starting on April 25, 2024, and continuing until May 2, 2024, UCLA allowed a group of activists to set up barricades in the center of campus and establish an encampment that blocked access to critical educational infrastructure on campus.

5. The activists chanted antisemitic threats like “death to the Jews,” “free Palestine from the hand of Jews,” and “from the River to the Sea, Palestine will be free,” proudly trumpeting their hatred of the Jewish people. But their actions went well beyond such chants.

1 6. With the knowledge and acquiescence of UCLA officials, the
2 activists enforced what was effectively a “Jew Exclusion Zone,”
3 segregating Jewish students and faculty and preventing them from
4 accessing the heart of campus, including classroom buildings and the
5 main undergraduate library. In many cases, the activists set up barriers
6 and locked arms together, preventing those who refused to disavow Israel
7 from passing through.

8 7. To enter the Jew Exclusion Zone, a person had to make a statement
9 pledging their allegiance to the activists’ views and have someone within
10 the encampment “vouch” for the individual’s fidelity to the activists’
11 cause. While this may have prevented a pro-Israel Christian from
12 entering the Zone and permitted access for a Jewish person willing to
13 comply with the enforcers’ demands, given the centrality of Jerusalem to
14 the Jewish faith, the practical effect was to deny the overwhelming
15 majority of Jews access to the heart of the campus.

16 8. Activists issued wristbands or other forms of identification to those
17 who passed this Orwellian inquisition.

18 9. UCLA’s administration knew about the activists’ extreme actions,
19 including the exclusion of Jews. But, in a remarkable display of
20 cowardice, appeasement, and illegality, the administration not only did
21 nothing to stop it, but actively facilitated it.

22 10. UCLA Chancellor Gene Block publicly acknowledged that
23 “students on their way to class have been physically blocked from
24 accessing parts of the campus.”

25 11. Yet even as the activists continued to enforce the Jew Exclusion
26 Zone, Defendants ~~not only~~ failed to marshal resources to intervene—~~they~~
27 and affirmatively adopted a policy facilitating the Jew Exclusion Zone;
28 ~~ordering~~. Under this policy, officials ordered, among other things, UCLA

1 campus police to stand down and step aside. They even directed security
2 to set up the barricades establishing the encampment.

3 12. And not only that, but UCLA also hired security staff and
4 stationed them on the outskirts of the encampment and other restricted
5 areas.

6 13. But rather than instruct this additional staff to assist Jewish
7 students and faculty in accessing campus resources, UCLA instead
8 instructed them to discourage unapproved ~~students~~persons from
9 attempting to cross through the areas blocked by the activists and not to
10 intervene to help Jewish students and faculty, even in the wake of
11 violence from the encampment activists.

12 14. The security officers, acting as agents of Defendants, also laughed
13 and jeered at Jewish students, redirecting them away from the
14 encampment unless they were able to enter the Zone.

15 15. ~~14. The security officers, acting as agents of Defendants,~~Some
16 even informed Jewish ~~persons~~students that, if they wished to access the
17 encampment or other restricted areas, they would first need to obtain the
18 permission of the encampment members.

19 16. ~~15.~~ All told, the Jew Exclusion Zone existed on campus for a full
20 week, wreaking havoc on the lives of Jewish faculty and students who
21 were simply trying to teach, attend classes, and study for exams.

22 17. ~~16.~~ Each of the Plaintiffs was prevented from passing through the
23 Jew Exclusion Zone. Joshua Ghayoum, ~~a sophomore~~an undergraduate
24 and history major, was repeatedly blocked from passing through the
25 encampment to reach meetings and study sessions. Eden Shemuelian, a
26 ~~second-year~~ law student, was shooed away by a security officer who
27 chastised her and called her “the ~~problem~~issue” for attempting to
28 peacefully observe the encampment. ~~And~~ Yitzchok Frankel, a ~~second-~~

1 ~~year~~-law student, was harassed and blocked from approaching the
2 encampment by antisemitic activists, all with the assistance of UCLA
3 security. And Dr. Kamran Shamsa, a cardiologist in UCLA's medical
4 school, was blocked from accessing the encampment by UCLA security
5 and was later pushed back by security as he attempted to approach a pro-
6 Israel rally near the encampment.

7 18. Far from being a one-off incident, the chaos on campus
8 continued—and continues to this day. After the initial encampment was
9 belatedly cleared, activists staged at least three more occupations and
10 encampments throughout the remainder of the spring term, resulting in
11 disrupted finals, the takeover of buildings, and harassment of a campus
12 rabbi. And once the current academic year began, activists held what
13 they called a “Week of Rage” beginning on the anniversary of the October
14 7 terrorist attack, during which they repeatedly violated campus protest
15 rules with impunity, including setting up a new encampment on October
16 21.

17 19. ~~17.~~ UCLA boasts of its “open and inclusive environment that
18 nurtures the growth and development of all faculty, students,
19 administration and staff,”¹ and assures students that it does “not tolerate
20 acts of discrimination, harassment or conduct causing harm to
21 individuals on the basis of race, color, ethnicity,” “citizenship,” “national
22 origin,” or “religious beliefs.”² UCLA has a number of policies that
23 purport to implement these guarantees.

26 ¹ *Mission & Values*, UCLA, <https://perma.cc/7KUA-8NLV>.

27 ² *Inclusive Excellence Framework for Advancing EDI @ UCLA*, UCLA
28 <https://perma.cc/3HMJ-F5K6>.

1 20. ~~18.~~ But UCLA has failed to provide Jewish students, faculty, and
2 staff with the protection promised by such policies. Jews should not fear
3 for their safety when they walk around any public space, let alone the
4 campus of a prominent American research university.

5 21. ~~19.~~ Yet here we are. The administration's cowardly abdication of
6 its duty to ensure unfettered access to UCLA's educational opportunities
7 and to protect the Jewish community is not only immoral—it is illegal.

8 22. ~~20.~~ Specifically, it violates numerous federal and state
9 constitutional guarantees, including the Equal Protection Clause, the
10 Free Exercise Clause, and the freedom of speech.

11 23. ~~21.~~ And it contravenes the basic guarantee of equal access to
12 educational facilities that receive federal funding, as well as numerous
13 other statutory guarantees of equality and fair treatment.

14 24. On August 13, 2024, the Court found that the student Plaintiffs
15 were entitled to a preliminary injunction to ensure that UCLA would no
16 longer discriminate against Jews in making campus facilities available.
17 The Court wrote: “In the year 2024, in the United States of America, in
18 the State of California, in the City of Los Angeles, Jewish students were
19 excluded from portions of the UCLA campus because they refused to
20 denounce their faith. This fact is so unimaginable and so abhorrent to our
21 constitutional guarantee of religious freedom that it bears repeating,
22 *Jewish students were excluded from portions of the UCLA campus because*
23 *they refused to denounce their faith.* UCLA does not dispute this. Instead,
24 UCLA claims that it has no responsibility to protect the religious freedom
25 of its Jewish students because the exclusion was engineered by third-
26 party protesters. But under constitutional principles, UCLA may not
27 allow services to some students when UCLA knows that other students
28

1 are excluded on religious grounds, regardless of who engineered the
2 exclusion.” ECF 89 at 2 (emphasis in original).

3 25. The preliminary injunction prohibits Defendants “from offering
4 any ordinarily available programs, activities, or campus areas to
5 students if Defendants know the[y] ... are not fully and equally accessible
6 to Jewish students” and “from knowingly allowing or facilitating the
7 exclusion of Jewish students ... whether as a result of a de-escalation
8 strategy or otherwise.” *Id.* at 15.

9 26. Rather than agreeing to comply with the injunction, UCLA
10 immediately appealed and claimed that the Court’s order not to
11 discriminate against Jews “would improperly hamstring our ability to
12 respond to events on the ground and to meet the needs of the Bruin
13 community.” UCLA did not explain why it needs to be able to
14 discriminate against Jews in order to run its campus.

15 27. After a week of widespread, bipartisan criticism, UCLA relented,
16 voluntarily dismissed its appeal, and later filed an answer to Plaintiffs’
17 complaint. Still, at no point has UCLA taken responsibility for its role in
18 facilitating the antisemitism that has taken over its campus, including
19 the encampments.

20 28. Criticism of UCLA’s facilitation of antisemitism has not been
21 limited to the outside press. On October 16, 2024, the Task Force to
22 Combat Antisemitism and Anti-Israeli Bias at UCLA, which Defendant
23 Darnell Hunt established in February 2024 (before the rise of the initial
24 encampment), submitted a report containing withering criticism of
25 UCLA’s nakedly antisemitic actions and environment.

26 29. The Task Force noted that it was “troubled by the defense that was
27 offered by the University” in this case. “Jews and Israelis have been
28

1 victims of discrimination and harassment on the UCLA campus, and the
2 University should commit to remediation, rather than fighting the case.”

3 30. Indeed, according to the Task Force, “several of the defenses
4 asserted by the University to fight the injunction had the effect of
5 reinforcing a perception of its bias against Jews and/or supporters of
6 Israel and seemed to discount the equal protection of Jews at UCLA.”

7 31. “For example,” the Task Force continued, “the University
8 repeatedly argued that its decision to allow the encampment to continue
9 was an appropriate and reasonable ‘de-escalation’ tactic,” but “[t]he
10 argument that discrimination against a protected class ... is an
11 appropriate or reasonable tactic for achieving any objective is
12 problematic,” and “[i]t is doubtful that the University would make such
13 an argument to rationalize discrimination against any other identity
14 category protected by state or federal law.”

15 32. Nor did the Task Force find UCLA’s argument “that it lacked
16 ‘control’ over third parties in the encampment” remotely persuasive.
17 “[T]hat defense is undermined by the fact that the University eventually
18 gave up on its de-escalation strategy and organized a breakup of the
19 encampment and arrest of the protesters. UCLA could have decided to
20 end the encampment when it was established, but it expressly decided to
21 let the encampment protest and violations of law and University rules
22 continue.”

23 33. Thus, according to the Task Force, this Court “[a]ppropriately ...
24 rejected UCLA’s defense and issued the injunction.”

25 34. And the Task Force “urge[d] the University to stop fighting the
26 Frankel case, and instead invest resources in improving the climate on
27 campus. The University should work with plaintiffs and other Jewish
28

1 stakeholders at UCLA ... to develop a comprehensive plan to dampen or
2 stop antisemitic and anti-Israeli bias on campus.”

3 35. UCLA has done no such thing.

4 36. 22. Plaintiffs ~~need immediate~~ are entitled not only to permanent
5 injunctive relief ~~to ensure that neither they nor any other Jew will again~~
6 ~~suffer from the discrimination they have endured. And, but also damages~~
7 against the Regents and the individual Defendants. Indeed, because the
8 UCLA administration’s actions amount to sanctioning segregation, their
9 clearly unconstitutional actions entitle Plaintiffs to hold the school’s
10 administrators personally liable for their reprehensible failures.

11 37. 23. In 1790, President George Washington wrote to the Hebrew
12 Congregation of Newport, Rhode Island, which had sought assurances
13 about the place of Jews within American society. He wrote, “May the
14 Children of the stock of Abraham, who dwell in this land, continue to
15 merit and enjoy the good will of the other Inhabitants; while every one
16 shall sit in safety under his own vine and figtree, and there shall be none
17 to make him afraid.”³

18 38. 24. UCLA has grievously failed to live up to Washington’s promise
19 that none shall be made afraid. But this Court can ensure ~~that his, as it~~
20 already has once in issuing a preliminary injunction, that Washington’s
21 promise—and, more importantly, the promises of the United States
22 Constitution and civil rights laws—are kept.

23 **JURISDICTION AND VENUE**

24 39. 25. The Court has subject-matter jurisdiction under 28 U.S.C.
25 §§ 1331 and 1343 over Plaintiffs’ claims arising under the Constitution

26 ³ Letter from George Washington to the Hebrew Congregation in
27 Newport, Rhode Island (Aug. 18, 1790), in *Founders Online*, National
28 Archives, <https://perma.cc/VUR8-G3BC>.

1 and laws of the United States. The Court has supplemental jurisdiction
2 over Plaintiffs' state law claims because they "form part of the same case
3 or controversy." 28 U.S.C. § 1367(a).

4 40. ~~26.~~ The Court has authority to issue the declaratory and injunctive
5 relief sought under 28 U.S.C. §§ 2201 and 2202.

6 41. ~~27.~~ Defendants' constitutional violations are actionable under 42
7 U.S.C. § 1983.

8 42. ~~28.~~ Venue lies in this district under 28 U.S.C. § 1391(b), including
9 because (i) at least one Defendant resides in the Central District of
10 California and all Defendants reside in the State of California, and (ii) a
11 substantial part of the events or omissions giving rise to the claim
12 occurred in the Central District of California.

13 THE PARTIES

14 43. ~~29.~~ Plaintiff Yitzchok Frankel is Jewish. He is a student at the
15 UCLA School of Law who just ~~completed~~began his ~~second~~third year of
16 law school. Frankel resides in Los Angeles, California.

17 44. ~~30.~~ Plaintiff Joshua Ghayoum is Jewish. He just ~~completed his~~
18 ~~sophomore~~began his junior undergraduate year at UCLA. Ghayoum
19 resides in Los Angeles, California.

20 45. ~~31.~~ Plaintiff Eden Shemuelian is Jewish. She is a student at the
21 UCLA School of Law who just ~~completed~~began her ~~second~~third year of
22 law school. Shemuelian resides in Los Angeles, California.

23 46. Plaintiff Dr. Kamran Shamsa, M.D., is Jewish. He is an Associate
24 Clinical Professor at UCLA's David Geffen School of Medicine. Shamsa
25 resides in Los Angeles, California.

26 47. ~~32.~~ Defendant Regents of the University of California is a public
27 agency within the meaning of Cal. Gov't Code § 7920.525(a) and is
28 empowered under the California Constitution, Article IX, Section 9, to

1 administer the University of California, including the University of
2 California, Los Angeles. The Board of Regents is the governing body for
3 the University of California system and under Article IX, Section 9, of the
4 California Constitution has “full powers of organization and
5 government.” The Board of Regents has its principal place of operation in
6 Oakland, California.

7 48. ~~33.~~ Defendant Dr. Michael V. Drake is the current President of the
8 University of California and has served in that position since August
9 2020. As President, Drake oversees and is responsible for the operations
10 of the entire University of California system, which includes UCLA.
11 Drake is sued in both his personal capacity and in his official capacity.
12 Drake resides in California.

13 49. ~~34.~~ Defendant Dr. Gene D. Block ~~is the current~~ served as
14 Chancellor of UCLA ~~and has served in that position since~~ from August
15 2007 until July 31, 2024. As Chancellor, Block ~~is~~ was the highest-ranking
16 university official at UCLA, including during the 2023-2024 academic
17 school year. Block’s duties ~~include~~ included establishing campus policies,
18 goals, and strategy. He is sued in both his personal capacity and in his
19 official capacity. Block resides in this judicial district.

20 50. ~~35.~~ Defendant Dr. Darnell Hunt is the current Executive Vice
21 Chancellor and Provost of UCLA and has served in that position since
22 September 2022. Hunt is also currently serving as UCLA’s Interim
23 Chancellor. He is sued both in his personal capacity and in his official
24 capacity. Hunt resides in this judicial district.

25 51. ~~36.~~ Defendant Michael J. Beck is the current Administrative Vice
26 Chancellor of UCLA and has served in that position since March 2016.
27 Beck was in charge of the public safety operations of the school ~~at all~~
28

1 ~~relevant times~~ from October 7, 2023, through May 5, 2024.⁴ During this
2 time, the UCLA Police Department (“UCLA PD”) reported to and took
3 direction from him. Beck has senior management responsibility for a
4 broad spectrum of operational and service units at UCLA and is
5 responsible for developing policy, monitoring compliance, and overseeing
6 campus operations. Defendant Beck is sued in both his personal capacity
7 and in his official capacity. Beck resides in this judicial district.

8 52. 37. Defendant Monroe Gorden, Jr., is the current Vice Chancellor,
9 Student Affairs, of UCLA and has served in that position since April
10 2018. Gorden’s role spans the entire range of student needs and interests
11 from early outreach through graduation, housing, physical and emotional
12 wellness, recreation, and student organizations. Gorden is sued both in
13 his personal capacity and in his official capacity. Gorden resides in this
14 judicial district.

15 53. 38. Defendant Rick Braziel ~~is~~ has served as the Associate Vice
16 Chancellor for Campus Safety at UCLA since May 5, 2024. In this role,
17 Braziel serves as the head of the newly created Office of Campus Safety
18 at UCLA, which as of May 5, 2024, oversees the UCLA ~~Police Department~~
19 ~~(“UCLA PD”)~~. Braziel is sued in his personal capacity and his official
20 capacity. Braziel resides in this judicial district.

21 54. Defendant Braziel reports directly to the Chancellor of the
22 University and the Chief of the UCLA PD reports to Defendant Braziel.
23 Braziel and Beck work closely together on matters relating to campus
24 safety.

27 ⁴ Gene D. Block, *Changes to Campus Security Operations*, UCLA
28 Chancellor (May 5, 2024), <https://perma.cc/Y9DV-4A3H>.

1 55. Defendants Hunt, Beck, and Gorden serve on UCLA's senior
2 leadership team, as did Block during his tenure as Chancellor.

3 56. UCLA's senior leadership team is ultimately responsible for
4 leading and running UCLA's campus. The senior leadership team
5 managed and oversaw UCLA's response to antisemitism and
6 demonstrations on campus during the 2023-24 academic year, including
7 making critical strategic and operational decisions about UCLA's
8 response to the encampments.

9 57. On information and belief, by virtue of his role as President of the
10 University of California system, Defendant Drake consulted regularly
11 with UCLA's senior leadership team about UCLA's response to
12 antisemitism and the encampments and was a key decisionmaker in all
13 significant strategic and operational decisions relating thereto, and he is
14 similarly involved in managing UCLA's response to antisemitism on an
15 ongoing basis.

16 58. By virtue of his role as Assistant Vice Chancellor for Campus
17 Safety, Defendant Braziel is closely involved with discussions and
18 strategic decisions made by UCLA's senior leadership with respect to
19 campus safety issues, including without limitation, antisemitism and
20 encampments on campus.

21 59. ~~39.~~ All individual Defendants are persons acting under color of
22 state law within the meaning of 42 U.S.C. § 1983.

23 **FACTUAL BACKGROUND**

24 **A. UCLA**

25 60. ~~40.~~ The University of California, Los Angeles is a large public
26 research university located in the Westwood neighborhood of Los
27 Angeles, California, which is within the Central District of California.
28

1 61. ~~41.~~ UCLA is one of the largest universities in California, with over
2 33,000 undergraduate students and over 13,000 graduate students.

3 62. ~~42.~~ UCLA is part of the 10-campus University of California
4 system, which includes other universities such as the University of
5 California, Berkeley.

6 63. ~~43.~~ UCLA's campus is spread across 419 acres of publicly owned
7 land that is, as a general matter, open to the public.

8 64. ~~44.~~ UCLA's Younes and Soraya Nazarian Center for Israel Studies
9 is the university's center promoting the study of modern Israel and was
10 the first of its kind on the West Coast when it was founded in 2010.

11 65. ~~45.~~ Approximately eight percent of UCLA's 33,000 undergraduate
12 students are Jewish.

13 66. ~~46.~~ UCLA tells its students that its policies exist to "create and
14 maintain a safe, supportive, and inclusive campus community that
15 engages students."⁵

16 67. ~~47.~~ The UCLA administration has repeatedly trumpeted its
17 commitment to inclusion. Indeed, UCLA stated that it "will never remain
18 silent when unlawful actions threaten our students and community
19 members."⁶

20 68. ~~48.~~ As a public university, UCLA has a policy for public protests
21 that includes time, place, and manner restrictions.⁷
22

23 ⁵ *Student Conduct Code*, UCLA Office of the Dean of Students,
24 <https://perma.cc/G6JD-E9TG>.

25 ⁶ UC President Janet Napolitano and UC Chancellors, *A Letter to the*
26 *UC Community on Today's DACA Decision*, UCLA Chancellor (June 18,
2020), <https://perma.cc/A2ZC-TR4F>.

27 ⁷ *Your First Amendment Rights as a Student at UCLA* at 3, UCLA
28 Student Affairs, <https://perma.cc/FP2Z-8NWC>.

1 69. ~~49.~~ The policy specifically notes that “speech and assembly on
2 university grounds” “must not interfere with the orderly operation of the
3 campus and must be conducted in a manner that reasonably protects
4 others from becoming involuntary audiences.”

5 70. ~~50.~~ For instance, it violates the regulations to “block entrances to
6 or otherwise interfere with the free flow of traffic into and out of campus
7 buildings,” “knowingly and willfully interfere with the peaceful conduct
8 of the activities of the campus or any campus facility by intimidating,
9 harassing, or obstructing any University employee, student, or any other
10 person having lawful business with the University,” and to “camp or
11 lodge, except in authorized facilities or locations.”⁸

12 71. ~~51.~~ UCLA’s policies do not allow private individuals to exercise
13 exclusive control over campus facilities or spaces.

14 72. ~~52.~~ UCLA also has an anti-discrimination policy, which protects
15 students and faculty from discrimination and harassment.

16 73. ~~53.~~ The policy includes reporting and investigation mechanisms
17 and promises that “[a]ny individual can report conduct that may be
18 Prohibited Conduct. The University will respond promptly and equitably
19 to such reports. This includes appropriate action to stop, prevent, and
20 remedy the Prohibited Conduct.”⁹

21 **B. Antisemitic Protests at UCLA Following the October 7th**
22 **Attack**

23 74. ~~54.~~ In the wake of the deadly Hamas attacks against Israel on
24 October 7, 2023, protests emerged around the country, frequently on
25 college campuses.

26 ⁸ *Id.* at 7-8.

27 ⁹ *Anti-Discrimination Policy* at 5, University of California Systemwide
28 Office of Civil Rights (Feb. 20, 2024), <https://bit.ly/3KqZ1pj>.

1 ~~75. 55.~~ These protests often included disturbing antisemitic language
2 and imagery.

3 ~~76. 56.~~ As Chancellor Block has admitted in sworn testimony, UCLA
4 has not been “immune to the disturbing rise of antisemitism across our
5 country since October 7th.”¹⁰

6 ~~77. 57.~~ UCLA was also the site of antisemitic demonstrations.

7 ~~78. 58.~~ For example, at an October 12, 2023, demonstration at Bruin
8 Plaza—a thoroughfare in the heart of UCLA’s undergraduate campus—
9 activists chanted “Itbah El Yahud” (“slaughter the Jews” in Arabic) and
10 carried antisemitic signs.

11 ~~79. 59.~~ Counter-protesters present at the time were identifiably
12 Jewish, through cultural or religious clothing and jewelry, or were
13 identifiably pro-Israel, based on holding or wearing insignia of Israeli
14 flags.

15 ~~80. 60.~~ Police officers were present but did not intervene.

16 ~~81. 61.~~ A few weeks later, a UCLA faculty member found a piece of
17 paper entitled “Loudmouth Jew” accompanied by a book cover
18 prominently featuring a swastika on top of a pile of trash placed outside
19 the faculty member’s home.

20
21
22
23
24
25
26 ¹⁰ ~~House Comm. on Educ. & the Workforce, Calling for Accountability:~~
27 *Stopping Antisemitic College Chaos: Hearing Before the H. Comm. on*
28 *Educ. & the Workforce*, 118th Cong. at 41:10-41:17, YouTube (May 23,
2024), <https://bit.ly/3R8V3FD> (statement of Chancellor Block).

1 82. ~~62.~~ Figure 1 is a picture of the “Loudmouth Jew” paper.

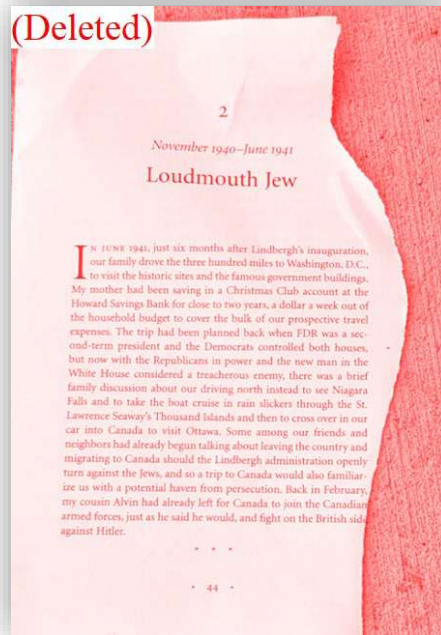


Figure 1

~~Figure 1~~

26 83. ~~63.~~ Figure 2 is a picture of the book cover featuring a
27 swastika.
28

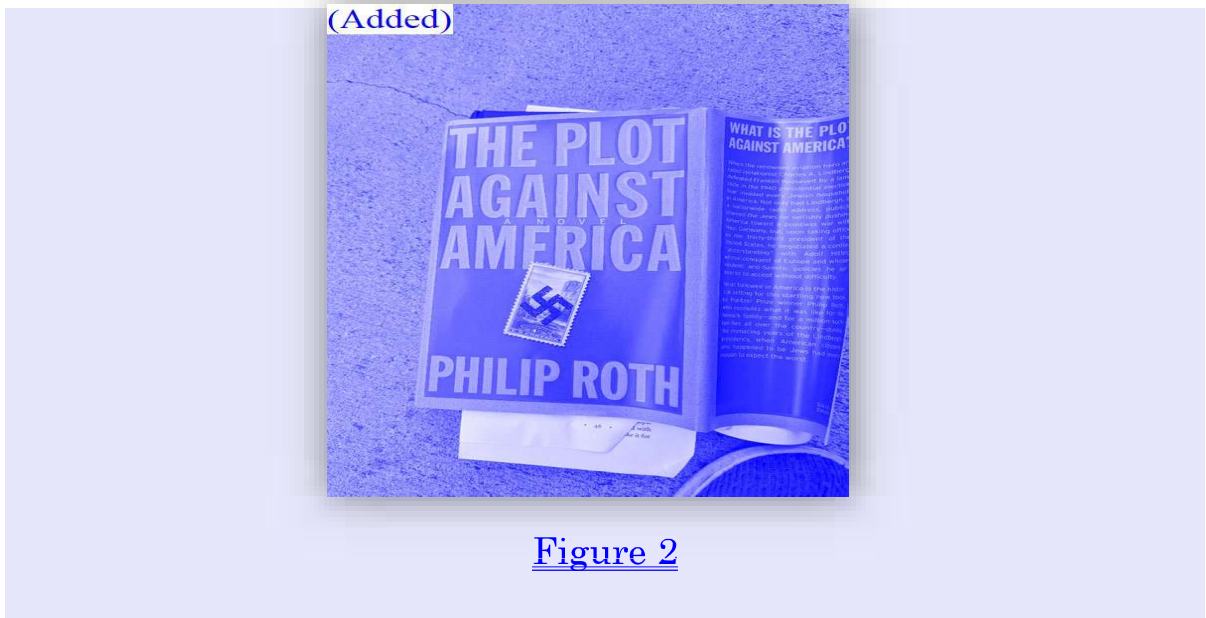
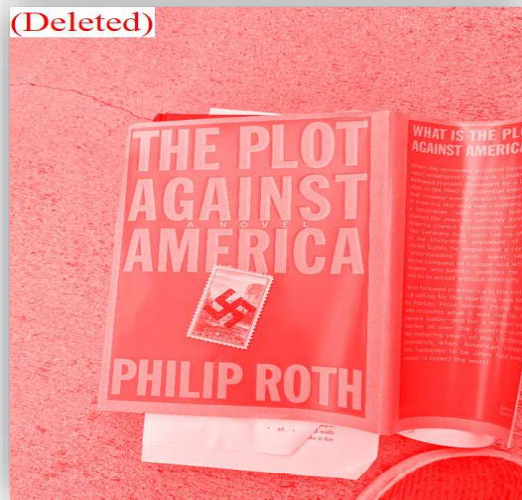


Figure 2



Block
to the
community
2023, in
that the
conflict in

Chancellor
issued a letter
UCLA
on October 27,
which he
acknowledged
“ongoing
the Middle

East” had “stirred very deep emotions in many of us.”¹¹ He stated
that these emotional responses do “not in the least give anyone in
our community—or anyone visiting our campus—license to make
our students, staff or faculty feel unsafe.”¹²

^{85. 65.} But the antisemitic protests at UCLA continued
unabated.

^{86. 66.} On November 8, 2023, hundreds of ~~agitators~~ activists
swarmed the UCLA School of Law, holding signs and chanting “from
the River to the Sea,” “there’s only one solution,” “intifada,” “death
to Israel,” and “death to Jews.”

^{87. 67.} Also on November 8, 2023, at a Students for Justice in
Palestine protest, harassers chanted “beat that fucking Jew”

¹¹ Gene D. Block, *Maintaining a Safe Learning and Working Environment for All*, UCLA Chancellor (Oct. 27, 2023), <https://perma.cc/Q9A9-7F7T>.

¹² ~~Gene D. Block, *Maintaining a Safe Learning and Working Environment for All*, UCLA Chancellor (Oct. 27, 2023), <https://perma.cc/Q9A9-7F7T>~~ *Id.*

1 through a megaphone while bashing a piñata bearing an image of
2 Israeli Prime Minister Benjamin Netanyahu.⁴²¹³

3 ~~88. 68.~~ In response to these threats of violence and displays of
4 anti-Jewish hostility, Chancellor Block sent another
5 communication—an email to the campus community that
6 acknowledged a “rise in reprehensible acts of Antisemitism” both
7 globally and on campus.¹⁴ He described the November 8, 2023,
8 outburst as “an event” involving “protected speech under the First
9 Amendment.”⁴³¹⁵

10 ~~89. 69.~~ Yet he was forced to acknowledge that “individuals
11 exhibited extremely hateful behavior and used despicable
12 Antisemitic language, which was captured on video and shared
13 widely, frightening many within our community.”⁴⁴¹⁶

14 ~~90. 70.~~ Chancellor Block pledged to “work against” such “bigotry”
15 and that his “administration [would] launch[] its own set of efforts
16 to strengthen community and reaffirm our values in this period of
17 intense strife.”⁴⁵¹⁷

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20 ⁴²¹³ Greg Gilman, *UCLA Condemns ‘Hateful Behavior,’ ‘Antisemitic*
21 *Language’ from Pro-Palestinian Student Protesters*, Los Angeles
Magazine (Nov. 12, 2023), <https://bit.ly/3WMdWBK>.

22 ¹⁴ [Gene D. Block, *Standing Against Bigotry at the University of*](https://perma.cc/4SMG-4T6C)
23 [California, UCLA Chancellor \(Nov. 10, 2023\), https://perma.cc/4SMG-](https://perma.cc/4SMG-4T6C)
24 [4T6C.](https://perma.cc/4SMG-4T6C)

25 ~~⁴³¹⁵ Gene D. Block, *Standing Against Bigotry at the University of*~~
26 ~~*California, UCLA Chancellor (Nov. 10, 2023), https://perma.cc/4SMG-*~~
27 ~~*4T6C*~~^{Id.}

27 ⁴⁴¹⁶ *Id.*

28 ⁴⁵¹⁷ *Id.*

1 91. ~~71.~~ These words proved hollow. In the following months,
2 Jewish students and faculty at UCLA began to raise safety concerns
3 after anti-Israel protests caused numerous incidents affecting
4 Jewish faculty, staff, and students.

5 92. ~~72.~~ For instance, later in November, the Co-Director of UCLA
6 Chabad, Rabbi Dovid Gurevich, “said he thinks many Jewish
7 students have felt unsafe since the Oct. 7 attack and that his
8 organization has recently increased security measures.”⁺⁶¹⁸

9 93. ~~73.~~ And a number of Jewish students recounted seeing
10 antisemitic symbols (such as ~~a swastika carved~~ swastikas engraved
11 into ~~a tree~~ tables and trees), hearing anti-Jewish chants, and being
12 subject to harassment because they are Jewish. These instances and
13 others left many Jewish students and faculty feeling “honestly
14 scared for” their “life” when walking on campus.⁺⁷¹⁹

15 94. ~~74.~~ In another incident, of which Chancellor Block was aware,
16 pro-Palestinian activists were seen on campus holding knives.⁺⁸²⁰

17 95. ~~75.~~ Several Jewish students, including Shemuelian and
18 Ghayoum, were forced to miss class or attend class remotely to avoid
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21 ⁺⁶¹⁸ Dylan Winward, *Survivor recounts experience of Oct. 7 attack at*
22 *event hosted by Chabad at UCLA*, Daily Bruin (Nov. 18, 2023),
23 <https://perma.cc/94HX-5YEQ>.

24 ⁺⁷¹⁹ Dylan Winward & Catherine Hamilton, *Jewish students express*
25 *concern over antisemitism on UCLA campus*, Daily Bruin (Nov. 19, 2023),
<https://perma.cc/TDP6-2876>.

26 ⁺⁸²⁰ ~~House Comm. on Educ. & the Workforce~~, *Calling for Accountability:*
27 *Stopping Antisemitic College Chaos: Hearing Before the H. Comm. on*
28 *Educ. & the Workforce*, 118th Cong. at 2:27:14-2:27:40, YouTube (May
23, 2024), <https://bit.ly/3WYmUfm> (statement of Chancellor Block).

1 pro-Palestinian rallies on campus and out of fear for their own
2 safety.

3 96. ~~76.~~ Activists also tore down and defaced posters depicting the
4 names and faces of the hostages brutally kidnapped by Hamas
5 terrorists.

6 97. ~~77.~~ On December 5, 2023, more than 350 faculty circulated
7 an open letter to Chancellor Block and the UCLA administration
8 explaining that these demonstrations resulted in “Jewish students,
9 staff and faculty who are afraid to be on campus, show solidarity
10 with Israel or practice their freedom of religion in public.”^{~~19~~21}

11 98. ~~78.~~ On another occasion, a UCLA faculty member observed
12 that the message “Free Palestine, Fuck Jews” was scrawled on the
13 bathroom wall in Schoenberg, UCLA’s music building. That graffiti
14 was washed away by custodians. But after the cleaning, it was
15 quickly replaced with new graffiti: “Fuck Zionists.”

16 99. ~~79.~~ Figure 3 is an image of the “Fuck Zionists” graffiti in the
17 music building.

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25 ^{~~19~~21} See, e.g., UCLA Faculty Against Terror, *Op-ed: UCLA must*
26 *condemn Hamas attacks, fight antisemitism on campus*, Daily Bruin
27 (Dec. 5, 2023), <https://perma.cc/A6KU-XBFS>; Dylan Winward, *UCLA*
28 *faces scrutiny for safety issues at protests for Israel, Palestine*, Daily Bruin
(Dec. 5, 2023), <https://perma.cc/QQF8-U8F4>.

(Added)



Figure 3

(Deleted)



~~Figure 3~~

~~100. 80.~~

On
6,
Pi—

December
2023, Alpha
Epsilon
UCLA's
Jewish

fraternity—was instructed by UCLA PD to hire extra security for a party it hosted as a safety precaution.

~~101. 81.~~ In February 2024, a scheduled talk at Royce Hall with former Israeli Minister of Foreign Affairs Tzipi Livni hosted by the Younes and Soraya Nazarian Center for Israel Studies was moved online in the wake of planned protests.^{~~2022~~}

^{~~2022~~} See, e.g., Michael Starr, *Tzipi Livni UCLA talk moved online after anti-Israel protest*, The Jerusalem Post (Feb. 28, 2024), ~~<https://perma.cc/L9LD-4GC7>~~<https://perma.cc/L9LD-4GC7>.

1 102. ~~82.~~ And, in late March 2024, an individual placed a
2 disturbing antisemitic statue on campus in front of the UCLA
3 Luskin Conference Center. The statue depicted a several-foot-tall
4 pig holding a bag of money and a birdcage with a keffiyeh, alongside
5 a bucket painted with a star of David.²⁴23

6 103. ~~83.~~ Figure 4 is a photograph of the statue.



16 ~~Figure 4~~

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26 ²⁴23 See, e.g., David Myers, Op-ed: Antisemitic imagery at UC Regents
27 meeting protest threatens campus discourse, Daily Bruin (Apr. 2, 2024),
28 ~~<https://perma.cc/E67X-LSJT>~~<https://perma.cc/E67X-LSJT>.

Figure 4

104. ~~84.~~ This antisemitic statue was designed and intended to threaten ~~Jewish students~~ Jews and make them feel unsafe and unwelcome on UCLA's campus.

105. ~~85.~~ The statue was far from the only public display of antisemitism on the UCLA campus.

106. ~~86.~~ Antisemitic images and chants became commonplace ~~on UCLA's campus~~. Swastikas, other Nazi references, and other antisemitic imagery appeared throughout campus.

C. A Jew Exclusion Zone is Established on Campus, ~~and UCLA Facilitates It~~

107. ~~87.~~ After a pro-Hamas protest encampment was established at Columbia University on April 17, 2024, activists at other colleges and universities around the country quickly began to copy the protest strategy.²²²⁴

108. ~~88.~~ On April 25, 2024, a group of activists "established," as Chancellor Block described it, "an unauthorized physical encampment on part of ~~the~~ Royce Quad."²³²⁵

109. ~~89.~~ Royce Quad, also known as Dickson Plaza, is a large, grassy space located between two buildings to its north (Royce Hall and Haines Hall), and two buildings to its south (Powell Library and Kaplan Hall), which represent the original four buildings of UCLA's campus.

²²²⁴ See, e.g., Jonathan Park et al., *In Photos: A nation shaken by camps for Gaza*, Daily Trojan (May 2, 2024), ~~<https://perma.cc/XF2W-FRP8>~~ <https://perma.cc/XF2W-FRP8>.

²³²⁵ Gene D. Block, *Affirming our Values in a Challenging Time*, UCLA Chancellor (Apr. 30, 2024), <https://perma.cc/T79X-62MZ>.

1 110. ~~90.~~ Royce Quad is one of the most-frequented areas on
2 campus where students gather during the day and between classes.
3 It is also a thoroughfare that students and faculty routinely use to
4 access the rest of UCLA's campus, including buildings like the
5 Student Activities Center and the main recreational facility, the
6 John Wooden Center, both of which are located just southwest of the
7 Quad. It is also located a short walk from many academic buildings,
8 including UCLA's business school and law school.

9 111. ~~91.~~ Royce Hall is considered "the symbol of UCLA,"
10 "distinguished by its impeccable beauty."²⁴26 Its award-winning
11 auditorium hosts many performances and events every year. Royce
12 Hall also has seminar and meeting rooms and hosts UCLA classes.

13 112. ~~92.~~ Powell Library, in turn, is UCLA's main undergraduate
14 library. Powell Library is not only UCLA's most popular place to
15 study, but "also offers a wide variety of programming, including
16 exhibits, concerts, dances, readings and other events that support
17 student learning and creativity."²⁵27

18 113. ~~93.~~ The encampment was set up on the Royce Quad near
19 both Royce Hall and Powell Library.²⁶28

20 114. ~~94.~~ At times, it extended as far west as the Janss Steps, a
21 long staircase leading up to Royce Quad.
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24 ²⁴26 UCLA, Royce Hall, <https://perma.cc/8FCB-W5HU>.

25 ²⁵27 UCLA, Powell Library, ~~[https://perma.cc/VG6D-](https://perma.cc/VG6D-LA6H)~~
26 ~~[LA6H](https://perma.cc/VG6D-LA6H)~~<https://perma.cc/VG6D-LA6H>.

27 ²⁶28 See Julia Zhou et al., Gallery: UCLA students supporting Palestine
28 ~~<https://perma.cc/27KB-V3Y9>~~<https://perma.cc/27KB-V3Y9>.

1 115. ~~95.~~ Those inside the encampment chanted antisemitic slurs
2 like “this is the final solution,” “fuck Israel,” “death to Jews,” “death
3 to Israel,” “intifada revolution,” and “from the River to the Sea.”

4 116. ~~96.~~ Chancellor Block ~~has~~later admitted in sworn testimony
5 that “intifada revolution” and “from the River to the Sea” are
6 antisemitic slogans and are potentially dangerous.²⁷²⁹

7 117. ~~97.~~ The use of antisemitic imagery was also common. These
8 images included money symbols and other references that play on
9 well-known antisemitic tropes and posters with drawings of pigs.
10 Inverted red triangles, a common image used by Hamas to denote
11 Jewish targets, were also present.

12 118. ~~98.~~ Other activists held signs with the Star of David crossed
13 out, a swastika being compared to the Israeli flag, or reading
14 “Nazionist.”

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24 ²⁷²⁹ ~~House~~ Calling for Accountability: Stopping Antisemitic College
25 Chaos: Hearing Before the H. Comm. on Educ. & the Workforce, ~~Calling~~
26 ~~for Accountability: Stopping Antisemitic College Chaos~~, 118th Cong. at
27 3:06:20-3:07:07:10, YouTube (May 23, 2024),
28 ~~https://www.youtube.com/watch?v=~~
~~4bu4eGHDNss~~ https://bit.ly/4dVuDPW (statement of Chancellor Block).

1 119. ~~99.~~ Figure 5 is a photograph of an antisemitic sign displayed
2 near the UCLA encampment.
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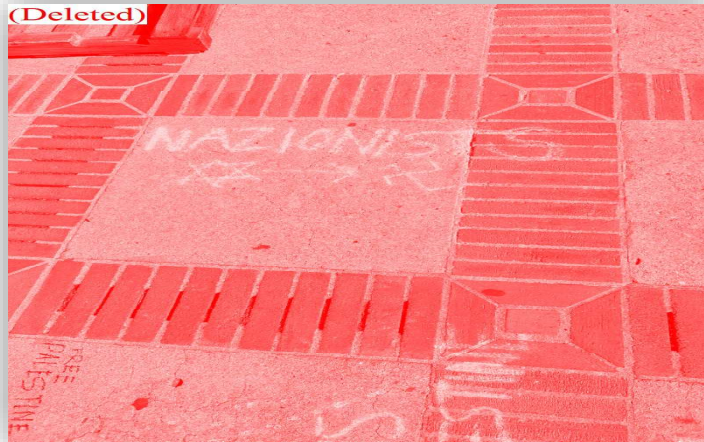




Figure 5

~~Figure 5~~

1 120. ~~100.~~ Figure 6 depicts chalking on campus sidewalks with a
2 swastika, a star of David, and the “Nazionist” statement.



12 ~~Figure 6~~



22 Figure 6

23 121. ~~101.~~ On at least one occasion, the word “Royce” on the
24 “Royce Hall” sign was replaced with the word “Intifada,” so that the
25 sign read Intifada Hall.

1 122. ~~102.~~ Figure 7 is a photograph of the activists' sign dubbing
2 Royce Hall Intifada Hall.



10
11 ~~Figure 7~~



19 Figure 7

20 123. ~~103.~~ Others scrawled graffiti on campus buildings and
21 displayed anti-Jewish slogans on campus.
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124. ~~104.~~ Figures 8 and 9 are photographs of examples of such



statements.

Figure 8

Figure 9



Figure 8

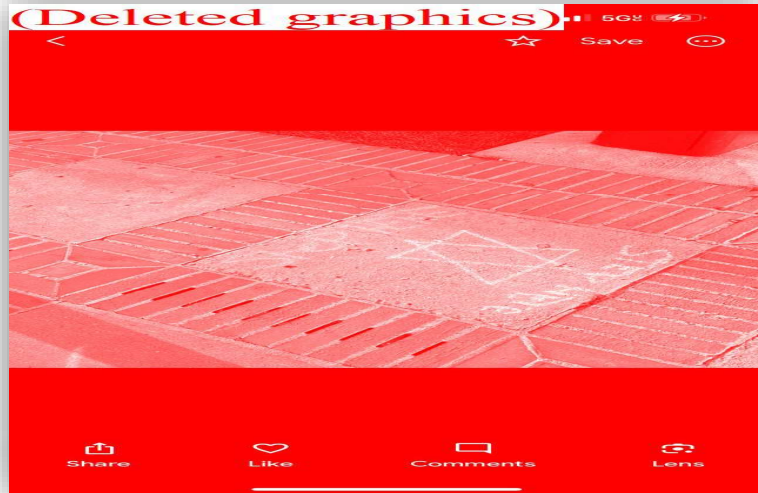


Figure 9

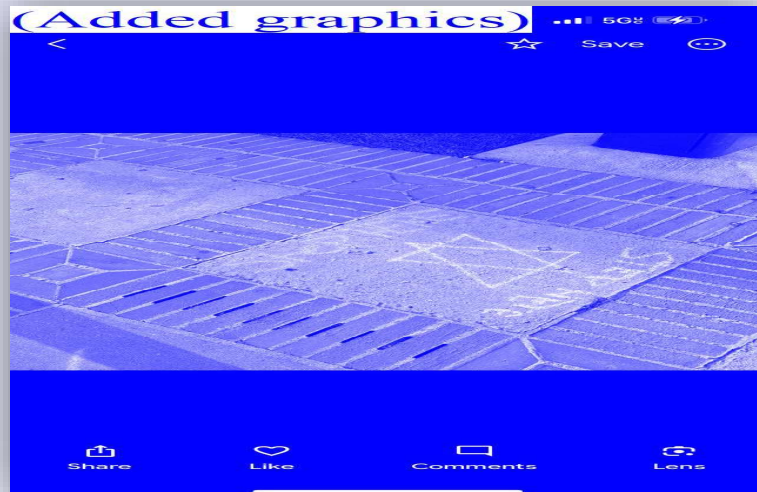
125. ~~105.~~ Posters depicting the hostages kidnapped and tortured by Hamas were also ripped down and defaced.

126. ~~106.~~ Some activists chalked Stars of David onto UCLA's sidewalks alongside directions to "Step Here."

1 127. ~~107.~~ Figure 10 is a photograph of such a “Step Here”
2 chalking.



12
13 ~~Figure 10~~



23 Figure 10

24 128. ~~108.~~ The encampment was eventually reinforced with
25 barricades, as activists established checkpoints for the creation of a
26 “Jew Exclusion Zone.”

27 129. ~~109.~~ To pass through these checkpoints, a person needed to
28 agree to the activists’ “demands.” These “demands” required any

1 person who wished to enter the encampment to condemn Israel as a
2 committer of “apartheid[] and genocide of the Palestinian people,”
3 to call for “an end to the occupation and genocide in Palestine,” and
4 to agree that UCLA should “[s]ever all UC-wide connections to
5 Israeli universities, including study abroad programs, fellowships,
6 seminars, and research collaborations, and UCLA’s Nazarian
7 Center.”

8 130. ~~110.~~ Even if the person expressed agreement with the
9 activists’ demands, he would still be denied entry if there was no one
10 already in the encampment who would “vouch” for him.

11 131. ~~111.~~ If the person succeeded in finding someone who could
12 vouch for him, then he would be given a wristband or other form of
13 pre-approved identification and allowed to pass through.

14 132. ~~112.~~ At these checkpoints, students and faculty were
15 frequently asked if they were a “Zionist,” or accused of being
16 “Zionists,” and were denied entry. Others were denied passage
17 simply for wearing a Star of David necklace.²⁸³⁰

18 133. ~~113.~~ For example, one student was stopped by activists at
19 the encampment because “you don’t have a wristband” and then,
20 when he questioned why they wouldn’t let Jewish students in, he
21 was asked, “[a]re you a Zionist?” When he responded ~~that he is a~~
22 ~~Zionist~~affirmatively, the activists responded that “we don’t let
23 Zionists inside.”

24 134. ~~114.~~ On information and belief, a case manager within
25 UCLA’s Office of Equity, Diversity, and Inclusion called a UCLA

26 ²⁸³⁰ Jenny Jarvie, ‘Are You a Zionist?’ Checkpoints at UCLA
27 encampment provoked fear, debate among Jews, LA Times (May 9, 2024),
28 ~~<https://perma.cc/X3TG-EF4J>~~<https://perma.cc/X3TG-EF4J>.

1 student on or about May 20, 2024, and asked the student if he was
2 “aware that the protesters had an agreement with the University to
3 screen students based on their viewpoints.”

4 135. ~~115.~~—These checkpoints prevented faculty, staff, and
5 students from accessing the Powell Library, Royce Hall, other
6 classrooms and UCLA facilities, and other areas of campus.

7 136. ~~116.~~—Figure 11 is a photograph of the UCLA encampment
8 and the barricade that the activists erected.



Figure 11

~~Figure 11~~

~~117. Defendants directed the UCLA PD not to intervene in the disturbances on campus, including with respect to the encampment and the Jew Exclusion Zone.~~

~~118. For example, on or about April 29, 2024, a parent of a Jewish student called the UCLA PD and reported that her son had been denied access to campus because he was Jewish and did not have an activist-approved wristband. During the conversation, the police dispatcher said: “the police are not intervening with that right now, and this is coming from the University. So if you had any questions or concerns, you would take it with the University itself. ... We have received a directive to not intervene at this time, yes. ... I would suggest contacting the Chancellor’s office or higher ups in the University with your concerns. ... We’re not forcing them to move out of the area. ... All I’m saying is we’re not unblocking the entrances. ... The school is saying that they will not be removed at this time.”~~

~~119. Moreover, Defendants stationed privately hired “CSC security teams,” who wore uniforms or vests reading CSC and/or Event Staff, on the outskirts of the encampment and other restricted areas. Seán Devine, *Campus Activity Updates (April 27th)*, UCLA: Bruins Safe Online (Apr. 27, 2024), <https://perma.cc/FN87-7NCM>. Defendants also dispatched “[s]afety personnel in Student Affairs Mitigators (SAMs) and Public Safety Aides (PSAs) uniforms ... around the encampment site,” *id.*, as~~

1 well as other “campus security.”²⁹

2 ~~120. CSC stands for Contemporary Services Corporation, which is a~~
3 ~~private security company with experience managing crowds and~~
4 ~~providing event security, including at colleges and universities.~~

5 ~~121. Figure 12 shows the CSC staff that (as further described below)~~
6 ~~stopped Plaintiff Shemuclian and ordered her away from the~~
7 ~~encampment area.~~

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28 ²⁹ Seán Devine, *Campus Activity Updates (April 29th)*, UCLA: Bruins Safe Online (Apr. 29, 2024),
<https://perma.cc/Q46U-BS7Z>.



~~Figure 12~~

~~122. Defendants instructed these various security groups to discourage unapproved students from attempting to cross through the areas blocked by the activists.~~

~~123. Campus security staff, acting as agents of Defendants, directed students away from the encampment and, in some cases, stated that they needed permission from the activists to access the encampment, essentially acting as force multipliers to the activists manning the barricades.~~

137. ~~124.~~ The Campus security staff turned away students and faculty, including Plaintiffs ~~Josh Ghayoum and Eden~~, Shemuelian, and Shamsa, who were not approved by the activists and thus refused to allow or to help them pass through Royce Quad to Powell Library or Royce Hall.

138. Signs in UCLA colors and emblazoned with UCLA's logo that were posted near the encampment proclaimed that "University

1 of California systemwide policy guidance directs UCLA not to
2 request law enforcement involvement preemptively, and only if
3 absolutely necessary to protect the physical safety of our campus
4 community.” Figure 12 depicts one such sign.



12 Figure 12

16 139. At one point, Defendant Hunt went into the encampment
17 and sat with the activists to negotiate with them.³¹

18 140. ~~125.~~ Dozens of faculty members supported the activists in
19 their efforts to set up and maintain the encampment.³⁰³²

21 ³¹ *Calling for Accountability: Stopping Antisemitic College Chaos:*
22 *Hearing Before the H. Comm. on Educ. & the Workforce, 118th Cong. at*
23 *1:18:32-1:18:59 YouTube (May 23, 2024), <https://bit.ly/4feNUNl>*
(statement of Chancellor Block).

24 ³⁰³² See, e.g., UCLA Department of History, *Statement of Members of the*
25 *Department of History in Response to the Attack on the Encampment on*
26 *30 April 2024*, UCLA: Division of Social Sciences (May 1, 2024),
27 ~~<https://perma.cc/AB66-7BKK>~~<https://perma.cc/AB66-7BKK> (members of
28 the department were at the encampment overnight); UCLA Department
of History, *Statement of Members of the Department of History in*

1 141. ~~126.~~ Figure 13 is a photograph of a pro-encampment faculty
2 protest on April 29, 2024. ~~3133~~



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Figure 13



Figure

13

Response to Clearing the Encampment, UCLA: Division of Social Sciences (May 2, 2024), ~~<https://perma.cc/W727-9GV7>~~<https://perma.cc/W727-9GV7>.

~~3133~~ Clara Harter, UCLA faculty walk out as pro-Palestinian demonstrations, counterprotests grow across California campuses, East Bay Times (Apr. 30, 2024), ~~<https://perma.cc/94DE-ZG37>~~<https://perma.cc/94DE-ZG37>.

1 142. ~~127.~~ On information and belief, these faculty encouraged
2 the activists to maintain the encampment despite the rampant
3 violations of stated policy and encouraged the UCLA administration
4 to continue to allow the illegal encampment to remain in place
5 unabated.

6 143. ~~128.~~ Faculty members called for fellow faculty to excuse
7 student absences related to presence at the encampment, and the
8 UCLA Faculty for Justice in Palestine called for “faculty to show
9 support through [their] physical presence at the protest.”
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144. ~~129.~~ Figure 14 is a screenshot of a faculty group encouraging faculty to attend the protest and excuse encampment-related absences.

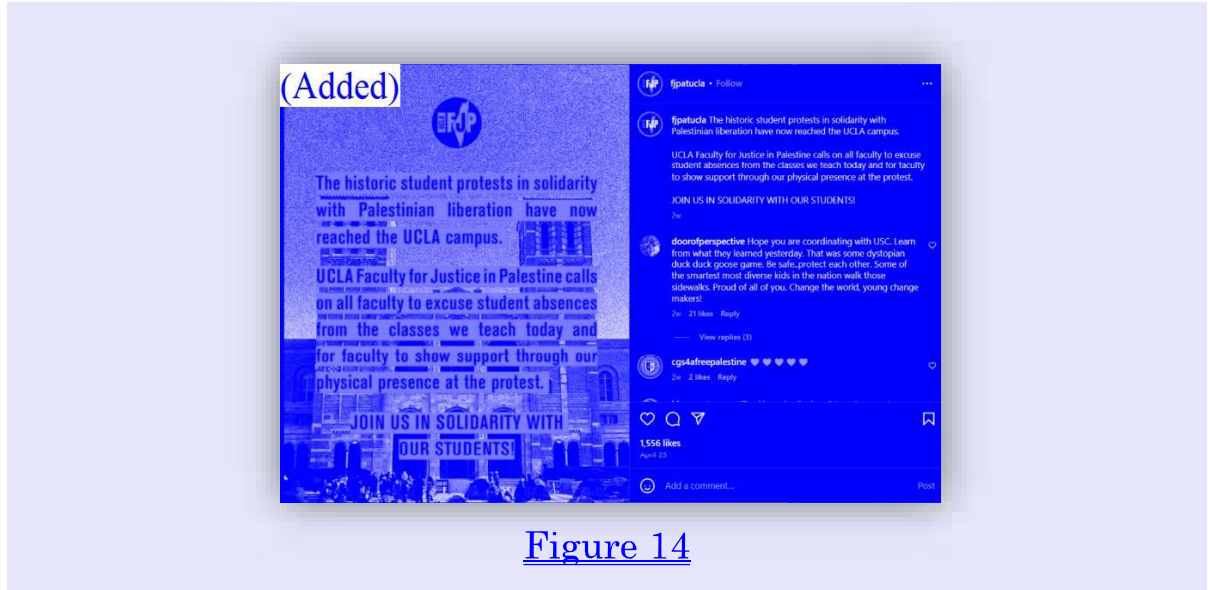


Figure 14



145. ~~130.~~ Some UCLA staff and faculty members chose to host classes and study sessions from inside the encampment and offered students participating in the encampment better grades and extra credit.

146. ~~131.~~ For example, on April 30, 2024, while the encampment was still in place, a lecturer within UCLA's labor studies

1 department posted on X a picture of himself standing outside a
2 graffiti-covered barricade and stated: “At UCLA’s Free Palestine
3 zone in solidarity with the students in my class. I will do all our
4 classes for from [sic] the encampment. Free Palestine.”

5 147. ~~132.~~ Other faculty cancelled classes or held office hours
6 near the encampment.

7 148. ~~133.~~ Faculty members were aware of the antisemitic nature
8 of the encampment and the systematic exclusion of Jewish students
9 and faculty from the encampment.

10 149. ~~134.~~ In fact, in an email sent on April 30, 2024, Plaintiff
11 Ghayoum’s history professor stated that he would hold additional
12 “office hours ... across from the encampment, if there is some space”
13 because he wished to “give students holding down the encampment
14 a chance to meet with me.” If a student, such as Ghayoum, did not
15 “feel comfortable coming in close proximity to th[e] encampment,”
16 such a student was required to contact the professor separately to
17 set up an appointment.

18 ~~135. Students who disagreed with the encampment faced physical~~
19 ~~violence.~~

20 D. UCLA Facilitates the Anti-Jewish Segregation

21 150. UCLA’s senior leadership team was aware of the possibility
22 that an encampment would form on UCLA’s campus.

23 151. On or around April 23, 2024, UCLA’s senior leadership
24 team, including without limitation Defendants Beck and Gorden,
25 discussed how UCLA might respond to a potential encampment,
26 given that encampments had appeared on other campuses around
27 the country.
28

1 152. Yet once it arose, the encampment operated for a week
2 without interference from Defendants, and indeed with their
3 support via the failure to enforce stated policies or allow ordinary
4 law enforcement intervention.

5 153. In fact, the encampment grew larger throughout the week,
6 but Defendants still did not take actions to dismantle it.

7 154. Defendant Beck was aware of the establishment of the
8 encampment by as early as 4:30 AM on April 25, 2024.

9 155. As Defendant Beck stated, the senior leadership team
10 agreed that the encampment would “need[] to be removed at some
11 point”; but they did not make specific plans to instruct law
12 enforcement and campus security—who directly reported to Beck—
13 to remove the encampment. Beck Decl., ECF 62-3 ¶¶ 5, 10.

14 156. In fact, instead of requesting the assistance of law
15 enforcement, the senior leadership team, including without
16 limitation Defendant Beck, directed the installation of barriers
17 made of bike racks around the encampment when it first arose on
18 April 25, with more being installed at the senior leadership team’s
19 direction on April 27, 2024.

20 157. Also on April 27, 2024, a campus-wide alert specifically
21 noted that UCLA had placed additional security around the
22 encampment to assist the activists, noting that “[s]afety personnel
23 in Student Affairs Mitigators (SAMs) and Public Safety Aides
24 (PSAs) uniforms are around the encampment site, and CSC security
25 teams are also located throughout campus.”³⁴

27 ³⁴ Seán Devine, *Campus Activity Updates*, UCLA: Bruins Safe Online
28 (Apr. 27, 2024), <https://perma.cc/FN87-7NCM>.

1 158. CSC stands for Contemporary Services Corporation, which
2 is a private security company with experience managing crowds and
3 providing event security, including at colleges and universities.

4 159. Figure 15 shows the CSC staff that (as further described
5 below) stopped Plaintiff Shemuelian and ordered her away from the
6 encampment area.



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17 Figure 15

18 160. UCLA campus security was under the supervision of
19 Defendant Beck, and upon information and belief was stationed
20 pursuant to the decisions of the senior leadership team.

21 161. Defendants instructed these various security groups not to
22 intervene and to discourage unapproved persons from attempting to
23 cross through the areas blocked by the activists.

24 162. On information and belief, neither Defendant Beck nor any
25 other member of the senior leadership team instructed police or
26 security personnel to help Jewish students and faculty cross the
27 encampment area to access campus buildings.
28

1 163. Instead, campus security staff, acting as agents of
2 Defendants, directed Jewish students and faculty away from the
3 encampment and, in some cases, stated that they needed permission
4 from the activists to access the encampment, essentially acting as
5 force multipliers to the activists manning the barricades.

6 164. As described more fully below, Plaintiffs all experienced the
7 effects of Defendants' directive to security to redirect Jewish
8 students and faculty away from the encampments or to not
9 intervene in even physical skirmishes.

10 165. 136. On These include but are not limited to Frankel's
11 observations of April 25, 2024, when a group of ~~agitators~~ activists left
12 the encampment, surrounding members of a counter-protest,
13 tearing down their signs, taking pictures of them, and assaulting
14 them. ~~Some held images of an inverted red triangle, a well known~~
15 ~~symbol employed by Hamas to mark Jewish military targets. In~~
16 ~~response, personnel wearing UCLA jackets brought in metal~~
17 ~~barricades and directed staff to use them to expand the protected~~
18 ~~area given to those in the encampment., and Shamsa's experience~~
19 on April 28 of being pushed to the ground while security stood
20 watching.

21 ~~137. And on April 28, 2024, a female student suffered a concussion~~
22 ~~after clashing with an encampment member. That same night, another~~
23 ~~female student was pepper sprayed by a member of the encampment.~~
24

~~D. UCLA's Response to the Anti-Jewish Segregation~~

~~138. The encampment operated for five days without any interference from Defendants, and indeed with their support via the failure to enforce stated policies or allow ordinary law enforcement intervention.~~

166. Additionally, on or about April 29, 2024, a parent of a Jewish student called the UCLA PD and reported that her son had been denied access to campus because he was Jewish and did not have an activist-approved wristband.

167. During the conversation, the police dispatcher said: "the police are not intervening with that right now, and this is coming from the University. So if you had any questions or concerns, you would take it with the University itself. ... We have received a directive to not intervene at this time, yes. ... I would suggest contacting the Chancellor's office or higher ups in the University with your concerns. ... We're not forcing them to move out of the area. ... All I'm saying is we're not unblocking the entrances. ... The school is saying that they will not be removed at this time."

168. These exclusionary policies were reiterated in a campus-wide alert sent on April 28. Instead of ensuring that Jewish students could pass through the area, the alert notes that "[w]e've taken several steps to help ensure people on campus know about the demonstration so they can avoid the area if they wish."³⁵

169. The alert also again noted that "[w]e also have safety teams who are wearing Student Affairs Mitigators (SAMs), Public Safety

³⁵ Seán Devine, *Campus Activity Updates*, UCLA: Bruins Safe Online (Apr. 28, 2024), <https://perma.cc/33DY-F74E>.

1 Aides (PSAs) and CSC security uniforms throughout the
2 demonstration site.”³⁶

3 170. ~~139. According to UCLA, the University~~And, consistent
4 with the UCLA signs hung near the encampment shown in Figure
5 12, the alert stated that it would not “request law enforcement
6 involvement preemptively,” but “only if absolutely necessary to
7 protect the physical safety of our campus community.”³²³⁷

8 171. This statement of UCLA’s exclusionary policy not to request
9 preemptive assistance refers to the Robinson-Edley Report, a
10 document published by the University of California system that,
11 according to UCLA, “affords UC campuses broad discretion to
12 respond to protests that violate their policies without unduly
13 impeding freedom of expression.” ECF 62 at 10-11.

14 172. This guidance provides a “flexible standard that,” as
15 Defendant Beck explained, “allows UCLA to make informed
16 judgments based on the context of each situation.” Beck Decl., ECF
17 62-3 ¶ 14.

18 173. ~~140. This~~UCLA’s toleration of clear violations of stated
19 policies, and its establishment of an exclusionary policy toward
20 Jews, persisted even though UCLA acknowledged on April 29, 2024,

23 ³⁶ Id.

24 ³²⁻³⁷ ~~Seán Devine, Campus Activity Updates (April 28th), UCLA: Bruins~~
25 ~~Safe Online (Apr. 28, 2024), <https://perma.cc/33DY-F74E>~~Id. Mary Osako,
26 vice chancellor for UCLA Strategic Communications, had previously
27 issued this same statement on April 26, 2024. See Statement on
28 Demonstrations, UCLA Newsroom (updated Apr. 28, 2024, 4:19 PM),
<https://perma.cc/HN5U-QWXP>.

1 that “some physical altercations broke out among demonstrators on
2 Royce Quad” ~~the previous day.~~³³ on April 28.³⁸

3 174. The April 28 violence included a female student’s suffering
4 a concussion after clashing with an encampment member and
5 another female student being pepper-sprayed by a member of the
6 encampment.

7 175. The exclusionary policies also persisted notwithstanding
8 the fact that the senior leadership team, including without
9 limitation Defendant Beck, was aware by at least April 29 that
10 encampment activists were using the barricades to block access to
11 campus facilities.

12 176. ~~141. The very next day,~~ Chancellor Block was fully aware
13 of the exclusionary policies as well. On April 30, Block sent a letter
14 to the entire UCLA community acknowledging that the
15 “unauthorized physical encampment” had led to
16 “frankly ... shocking and shameful” “tactics,” that the encampment
17 included “instances of violence completely at odds with our values,”
18 and that the encampment had resulted in “students on their way to
19 class [being] physically blocked from accessing parts of the
20 campus.”³⁴³⁹

21 177. ~~142.~~ He further acknowledged that these “shameful” tactics
22 left students feeling “bullied, threatened and afraid,” and left
23

24 ³³. Seán Devine, *Campus Activity Updates (April 29th)*, UCLA: Bruins Safe Online (Apr. 29, 2024),
25 <https://perma.cc/Q46U-BS7Z>.

26 ³⁸ Seán Devine, *Campus Activity Updates*, UCLA: Bruins Safe Online
27 (Apr. 29, 2024), <https://perma.cc/Q46U-BS7Z>.

28 ³⁴³⁹ Block, *Affirming Our Values in a Challenging Time*, *supra* note
~~23~~²⁵.

1 “many,” “especially our Jewish students, in a state of anxiety and
2 fear.”³⁵⁴⁰

3 178. ~~143.~~ Yet despite this knowledge, Defendants continued to
4 refuse to eliminate the Jew Exclusion Zone at the heart of ~~its~~ UCLA’s
5 campus.

6 179. ~~144.~~ Instead, Chancellor Block and the senior leadership
7 team continued to instruct the UCLA PD not to intervene.⁴¹ As a
8 result, many Jewish students, faculty, and staff continued to be
9 barred from accessing areas of campus generally available to the
10 entire community.

11 180. ~~145.~~ The same day Chancellor Block sent his letter, the
12 University acknowledged that the encampment was impeding
13 student access to certain parts of campus.

14 181. ~~146.~~ At 8:00 AM, the University sent a Campus Activity
15 Update tagged as a “Public Safety” alert stating that “The access to
16 Royce Quad is limited and as such, please enter Powell and Kaplan
17 Hall from the south-facing entrances; Royce and Haines Hall are
18 accessible through the north or west entrances. We will continue to
19 ensure people on campus know about the demonstration so they can
20 avoid the area if they wish. This includes having student affairs
21 representatives stationed near Royce quad to let Bruins and visitors
22
23
24

25 ³⁵⁴⁰ *Id.*

26 ⁴¹ *Id.* (asking that law enforcement only “investigate the recent acts of
27 violence” but not intervene to protect Jewish students or secure their
28 access to campus).

1 know about the encampment, redirect them if desired and to serve
2 as a resource for their needs.”³⁶⁴²

3 182. The alert also stated that UCLA was evaluating “[e]vents
4 and activities” “on a case-by-case basis” to determine whether they
5 could continue as scheduled.⁴³

6 183. 147. That same afternoon, the University announced that
7 “[a]ccess to Royce Hall is now closed through Friday. Alternate
8 locations are being identified as options for classes taking place in
9 Royce. Instructors will inform students about further information
10 regarding class location. Faculty should reach out to their
11 departments for possible classroom reassignments.”⁴⁴ UCLA also
12 closed Powell Library early at 5 PM.³⁷⁴⁵

13 184. 148. The alerts did not direct activists to remove the
14 barricades—and did nothing to ensure that Jewish faculty and staff
15 could access academic buildings and Royce Quad.

16 185. 149. In sum, Defendants acknowledged the threat to Jewish
17 students, opted to officially close crucial academic buildings to
18 facilitate the encampment, and did nothing to clear the illegal
19 encampment or stop ~~agitators~~activists at the encampment from
20 blocking access to Powell Library and other buildings on Royce Quad

21 ^{36.42} Seán Devine, *Campus Activity Updates* ~~(April 30th at 8:00AM)~~,
22 UCLA: Bruins Safe Online (Apr. 30, 2024, 8:00 AM),
23 <https://perma.cc/39EX-FXGR>.

24 ⁴³ Id.

25 ⁴⁴ Seán Devine, Campus Activity Updates, UCLA: Bruins Safe Online
26 (Apr. 30, 2024, 4:25 PM), <https://perma.cc/2XHC-8HKB>.

27 ~~^{37.45} Seán Devine, Campus Activity Updates (April 30th at 4:25PM),~~
28 ~~UCLA: Bruins Safe Online (Apr. 30, 2024), [https://perma.cc/2XHC-](https://perma.cc/2XHC-8HKB)~~
~~[8HKB](https://perma.cc/2XHC-8HKB)~~Id.

1 or to guarantee the ability of Jewish students and faculty to traverse
2 campus safely and freely.

3 186. 150. After refusing to intervene to protect the rights of
4 Jewish students and faculty for days, Defendants (including the
5 senior leadership team) for the first time authorized UCLA PD and
6 outside law enforcement to intervene ~~when~~ only after a confrontation
7 between encampment members and counter-protesters escalated
8 into a violent clash on the evening of April 30, 2024.⁴⁶

9 187. 151. Though UCLA PD and LAPD intervened ~~to separate~~
10 ~~the fighters but, they~~ continued to allow the encampment to remain
11 ~~in place~~ standing, including the barricades.

12 188. 152. Defendant Block explained Defendants ~~made the~~
13 decision ~~to allow the encampment to remain in place. On the~~
14 ~~morning of May 1, Chancellor Block sent in~~ an email to the entire
15 campus community, ~~condemning “the~~ on May 1, 2024. The email
16 condemned the “attack” on “the encampment that has been
17 established ... to advocate for Palestinian rights” by “a group of

18 instigators.”⁴⁷ It was only after this “attack” that UCLA decided to
19 “request[] support from external law enforcement agencies to help
20 end this appalling assault, quell the fighting and protect our
21 community.”⁴⁸ The email said nothing about prior attacks—both
22 physical and verbal—on Jewish students and faculty as they tried
23 to access academic buildings and traverse Royce Quad, nor did it
24

25 ⁴⁶ Gene D. Block, Condemning Violence in our Community, UCLA
26 Chancellor (May 1, 2024), <https://perma.cc/KB3A-7Q3W>.

27 ⁴⁷ Id.

28 ⁴⁸ Id.

1 promise to allow safe passage to Jewish students and faculty going
2 forward.⁴⁹

3 189. Nor did it mention anything about disbanding the
4 encampment.

5 190. 153.— In factTrue to the email's commitment, the
6 encampment remained in place on May 1, 2024. And UCLA and
7 Defendants did not restore full access to campus for Plaintiffs or
8 other Jewish faculty, staff, and students. Instead, UCLA took
9 several actions, including cancelling “all classes” on May 1, keeping
10 Royce Hall closed at least through May 3, and closing Powell Library
11 through the weekend,~~and requiring~~.⁵⁰ They also required remote
12 classes ~~during on~~ May 2 and 3.³⁸~~UCLA also~~ and closed other areas of
13 campus, including Geffen Academy, Lab School, and Early Care and
14 Education.³⁹51

15 191. 154. The next day, On May 2, Chancellor Block sent a second
16 email, acknowledging that the encampment was “unlawful” and “a
17 breach of policy” that his administration had nonetheless “allowed
18 ... to remain in place” and that it had resulted in
19 “~~demonstrators~~[d]emonstrators directly interfer[ing] with
20 instruction by blocking students’ pathways to classrooms” for
21

22 ⁴⁹ Id.

23 ⁵⁰ Seán Devine, Campus Activity Updates, UCLA: Bruins Safe Online
24 (May 1, 2024, 8:00 AM), <https://perma.cc/8SLY-QNLW>.

25 ³⁸ ~~Seán Devine, Campus Activity Updates (May 1st at 8:00 AM), UCLA: Bruins Safe Online (May 1,~~
~~2024), <https://perma.cc/8SLY-QNLW>.~~

26 ³⁹51 ~~Seán Devine, Campus Activity Updates (May 1st at 6:30 PM), UCLA:~~
27 ~~Bruins Safe Online (May 1, 2024), <https://perma.cc/3XXA-FLEC> (“all in-~~
28 ~~person classes are authorized and required to pivot to remote~~
~~for May 2-3), 6:30 PM), <https://perma.cc/3XXA-FLEC>.~~

1 “several days.”⁴⁰⁵² The email explained that ~~on the~~“early this
2 morning ~~of,~~” i.e., May 2, he and other UCLA ~~finally asked~~“officials
3 “made the decision to direct UCPD and outside law enforcement
4 officers to enter and clear the encampment.”⁴¹⁵³

5 192. ~~155.~~ The email went on to describe the “carefully developed”
6 plan that law enforcement used to clear the encampment, which
7 included “giv[ing] [the activists] several warnings” and “offer[ing]
8 ~~them several opportunities~~the opportunity to leave peacefully with
9 their belongings before officers entered the area.”⁵⁴

10 193. ~~156.~~ Chancellor Block has admitted in sworn testimony
11 that the “encampment was against policy” and “violated time, place,
12 and manner.”⁵⁵ And he has stated that he and the University
13 administration “should have been prepared to immediately remove
14 the encampment if and when the safety of our community was put
15 at risk.”⁴²⁵⁶

18 ⁴⁰⁵² Gene D. Block, *Our Community is in Deep Pain*, UCLA Chancellor
19 (May 2, 2024), ~~<https://perma.cc/E66L-Q5UA>~~<https://perma.cc/E66L-Q5UA>.

20 ⁴¹⁵³ *Id.*

21 ⁵⁴ *Id.*

22 ⁵⁵ *Calling for Accountability: Stopping Antisemitic College Chaos:*
23 *Hearing Before the H. Comm. on Educ. & the Workforce*, 118th Cong. at
24 2:45:21-2:45:27 YouTube (May 23, 2024), <https://bit.ly/4ha9PHn>
(statement of Chancellor Block).

25 ~~⁴²⁵⁶ *House Comm. on Educ. & the Workforce, Calling for Accountability:*~~
26 ~~*Stopping Antisemitic College Chaos*, 118th Cong. at 2:45:21 2:45:27,~~
27 ~~*45:03:00 45:08:00 YouTube (May 23, 2024), [https://www.youtube.com/](https://www.youtube.com/watch?v=4bu4eGIDNss)*~~
28 ~~*watch?v=4bu4eGIDNss (statement of Chancellor Block)*~~*Id.* at 45:03-
45:08.

1 194. ~~157.~~—His administration’s failed response to the
2 encampment led Chancellor Block to conclude that “urgent changes
3 [were] needed in how we administer safety operations.”~~48~~57

4 195. ~~158.~~ Thus, on May 5, 2024, Chancellor Block announced the
5 creation of a new “Office of Campus Safety” that reports directly to
6 Block and that is tasked with overseeing UCLA PD and other
7 departments.~~44~~58 Block also announced the creation of “a formal
8 advisory group with expert leaders” to assist this newly created
9 office.~~45~~59

10 196. ~~159.~~ Chancellor Block tapped Defendant Rick Braziel to
11 lead the Office of Campus Safety “as its inaugural associate vice
12 chancellor.”~~46~~60

24 ~~48~~57 Gene D. Block, *Changes to Campus Security Operations*, UCLA
25 Chancellor (May 5, 2024), <https://perma.cc/Y9DV-4A3H>.

26 ~~44~~58 *Id.*

27 ~~45~~59 *Id.*

28 ~~46~~60 *Id.*

1 **E. Radical Groups ~~Threaten Further Lawlessness~~Continue**
2 **Constructing Encampments on UCLA's Campus, and**
3 **UCLA Fails to Respond**

4 197. ~~160.~~ UCLA's tardy decision to finally end the blatant
5 segregation and targeted harassment of Jews did not bring an end
6 to the matter.

7 198. ~~161.~~ Radical groups affiliated with the encampment have
8 continued to call for similar actions and have even threatened that
9 bolder actions are soon to follow.

10 199. ~~162.~~ Even after the encampment was taken down, UCLA's
11 campus ~~has been~~was consumed with anti-Israel protests and further
12 attempts at occupying parts of campus.

13 200. ~~163.~~ The same day the encampment was finally cleared,
14 Students for Justice in Palestine at UCLA, one of the primary
15 organizers of the encampment, promised "we will not stop, we will
16 not rest."⁴⁷⁶¹

17 201. ~~164.~~ And, four days after the encampment was cleared,
18 activists associated with the encampment posted a letter in the
19 name of the "The Determined Palestine Solidarity Encampment,"
20 stating "we will not rest until they divest."⁴⁸⁶²

21 202. Consistent with the policy it followed since this wave of
22 rampant antisemitism took hold, however, UCLA refused to address
23 these threats and actions "preemptively."

24 ⁴⁷⁶¹ UCLA Palestine Solidarity Encampment, *Precursory Statement*
25 *from UCLA Palestine Solidarity Encampment* (May 2, 2024),
26 ~~<https://perma.cc/Y3P9-3MCK>~~<https://perma.cc/Y3P9-3MCK>.

27 ⁴⁸⁶² Palestine Solidarity Encampment at UCLA, *Refusing Co-optation*
28 (May 6, 2024), ~~<https://perma.cc/TW3A-BZXY>~~<https://perma.cc/TW3A-BZXY>.

1 203. Instead, UCLA extended its requirement for classes to be
2 held remotely over the weekend of May 4 and 5.⁶³

3 ~~204. 165. Some have already made good on these threats. For~~
4 ~~example~~And though UCLA attempted to return to in-person
5 learning on May 6, that plan proved to be short-lived. That same
6 day, activists again attempted to occupy Moore Hall—home to the
7 UCLA School of Education and Information Studies—on May 6,
8 ~~2024.~~

9 ~~##~~

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28 ~~##~~

⁶³ Seán Devine, *Campus Activity Updates*, UCLA: Bruins Safe Online (May 3, 2024), <https://perma.cc/R2F8-MKVS>.

1 205. ~~166.~~ Figure ~~15~~16 shows an Instagram post from Students
2 for Justice in Palestine at UCLA calling for students to occupy
3 Moore Hall on May 6, 2024.⁴⁹⁶⁴

4 206. ~~167.~~ Figure ~~16~~17 shows a door in Moore Hall with text over
5 the top posted by Students for Justice in Palestine at UCLA.⁵⁰⁶⁵



17 ~~Figure 15~~

17 ~~Figure 16~~



25 ⁴⁹⁶⁴ @SJPatUCLA, Instagram (May 6, 2024),
26 ~~<https://bit.ly/3RAE1R5>~~ <https://perma.cc/44CJ-XEJW?type=image> (call to
assemble at Moore Hall).

27 ⁵⁰⁶⁵ @SJPatUCLA, Instagram Story (May 6, 2024) (photo of occupation
28 of Moore Hall).



[Figure 16](#)

[Figure 17](#)

207. ~~168.~~ One week later, on May 13, 2024, Students for Justice in Palestine at UCLA and other affiliated groups called for activists to block access to two parking decks on campus.^{~~54~~66} In response, numerous activists marched and chanted in front of the parking deck and blocked access to the entrance point.

⁵⁴~~66~~ @SJPatUCLA, Instagram (May 13, 2024), <https://perma.cc/44CJ-XEJW?type=image><https://perma.cc/A295-Y94M>.

208. ~~169.~~ Figure ~~17~~18 shows an image of an Instagram post by Students for Justice in Palestine at UCLA calling for activists to assemble to block the parking decks.



Figure 18

~~Figure 17~~

~~170. These actions and the aftermath of the encampment have~~

1 ~~continued to wreak havoc on normal University operations and access to~~
2 ~~campus.~~

3 ~~171. For instance, Transfer Bruin Day, originally scheduled to be held~~
4 ~~on May 11, 2024, was postponed and moved online in response to ongoing~~
5 ~~threats of disruption.~~⁵²

6 ~~172. UCLA also extended its requirement for classes to be held~~
7 ~~remotely over the weekend of May 4 and 5.~~⁵³~~And though UCLA~~
8 ~~attempted to return to in-person learning on May 6, that plan proved to~~
9 ~~be short-lived.~~

10 209. ~~173. Early~~Accordingly, early on the morning of May 6, 2024,
11 the University declared that “[c]lasses and work in Moore Hall will
12 be remote today due to ongoing disruptions.”⁵⁴67

13 210. ~~174.~~ Later that same day, the University announced that
14 “[a]ll classes are moving remote today and campus operations are
15 limited due to ongoing disruptions.”⁵⁵68 An announcement that

21 ⁵² See Seán Devine, *Recent Updates*, UCLA: Bruins Safe Online (May 6 11, 2024),
22 <https://perma.cc/NQM2-YGK9>; see also Alexandra Crosnoe, *Transfer Bruin Day postponed, moved*
online following on-campus demonstrations, Daily Bruin (May 9, 2024), <https://perma.cc/Q6CG-LMFE>.

23 ⁵³ Seán Devine, *Campus Activity Updates (May 3rd)*, UCLA: Bruins Safe Online (May 3, 2024),
<https://perma.cc/R2F8-MKVS>.

24 ⁵⁴67 Seán Devine, *Campus Activity Updates (May 6th at 8:30AM)*, UCLA:
25 Bruins Safe Online (May 6, 2024), ~~<https://perma.cc/L4FM-VM4Y>~~, 8:30
26 AM, <https://perma.cc/L4FM-VM4Y>.

27 ⁵⁵68 Seán Devine, *Campus Activity Updates (May 6th at 10:15AM)*,
28 UCLA: Bruins Safe Online (May 6, 2024), ~~<https://perma.cc/P5N7-4GW6>~~,
10:15 AM, <https://perma.cc/P5N7-4GW6>.

1 afternoon declared that classes would be remote for May 6th
2 through 10th.⁵⁶⁶⁹

3 211. ~~175.~~ That announcement also stated that “Royce Hall and
4 Powell Library are closed and will remain so through Friday, May
5 10.”⁵⁷⁷⁰

6 212. Transfer Bruin Day, originally scheduled to be held on May
7 11, 2024, was postponed and moved online in response to ongoing
8 threats of disruption.⁷¹

9 213. ~~176.~~ Starting May 14, 2024, the same groups that ran the
10 encampment put on a series of full-day “teach-in” events on Royce
11 Quad “to reclaim both [their] space and ideas.”

12 214. ~~177.~~ On the morning of May 23, 2024, the same day that
13 Chancellor Block testified to Congress about antisemitism on
14 UCLA’s campus, the “Collective for the Liberation of Palestine”—an
15 assortment of student groups who instigated the original
16 encampment and now dubbed themselves the “student intifada”—
17 established ~~a new~~another encampment, setting up tents and
18 barricades on Kerckhoff Patio, near the Bruin Walk thoroughfare.

19 ~~178. In response, law enforcement and security staff set up a perimeter~~
20 ~~to prevent food and supplies from reaching the encampment. After UCLA~~

21
22 ⁵⁶⁶⁹ Seán Devine, *Campus Activity Updates* (~~May 6th at 4:00PM~~), UCLA:
23 Bruins Safe Online (May 6, 2024), ~~<https://perma.cc/E5KD-Y67Y>~~, 4:00
PM, <https://perma.cc/E5KD-Y67Y>.

24 ⁵⁷⁷⁰ *Id.*

25 ⁷¹ See Seán Devine, *Recent Updates*, UCLA: Bruins Safe Online (May 6-
26 11, 2024), <https://perma.cc/NQM2-YGK9>; see also Alexandra Crosnoe,
27 *Transfer Bruin Day postponed, moved online following on-campus*
28 *demonstrations*, Daily Bruin (May 9, 2024), [https://perma.cc/Q6CG-](https://perma.cc/Q6CG-LMFE)
[LMFE](https://perma.cc/Q6CG-LMFE).

1 ~~issued a statement declaring the encampment unlawful⁵⁸ and law~~
2 ~~enforcement began moving in, the activists relocated to Murphy Hall and~~
3 ~~then Dodd Hall before finally calling off the efforts.~~

4 215. Defendants Beck and Braziel recounted this incident in a
5 statement to the community, stating that the activists established a
6 new encampment “erecting barricades, establishing fortifications
7 and blocking access to parts of the campus and buildings” and
8 “disrupting campus operations” on Kerckhoff Patio.⁷²

9 216. Defendant Braziel, to whom the chief of UCLA PD now
10 “reports ... and takes direction,” Braziel Decl., ECF 62-5 ¶ 2,
11 explained the incident this way: after being told to “disperse,” the
12 activists relocated to another building, again “barricad[ing] access”
13 and “committ[ing] acts of vandalism.”⁷³ The vandalism included
14 writing the now-common phrase of “Intifada Hall” on an outside wall
15 of Dodd Hall. Only after all this, and another request to “disperse,”
16 did law enforcement move in.⁷⁴

17 217. Then, on June 10, activists again established
18 encampments, calling for *intifada* and prohibiting Jewish students
19 from entering. First, the activists “marched to the walkway at the
20 top of the Janss Steps and set up an unauthorized and unlawful
21 encampment with tents, canopies, wooden shields, and water-filled

23 ⁵⁸ ~~UCLA Newsroom, *Statement on demonstrators on Kerckhoff patio* (May 23, 2024),~~
24 ~~<https://perma.cc/FYC3-M648>.~~

25 ⁷² Statement on demonstrators on Kerckhoff patio, UCLA Newsroom
(May 23, 2024), <https://perma.cc/7L6U-47G4>.

26 ⁷³ Rick Braziel, *Updates on campus safety and recent demonstrations*,
27 UCLA Newsroom (May 24, 2024), <https://perma.cc/7PA9-66Q3>.

28 ⁷⁴ *Id.*

1 barriers.”⁷⁵ Acting under the direction of Defendant Braziel, the
2 police “issued multiple dispersal orders,” but the “unauthorized”
3 encampment nevertheless “restricted access to the general public”
4 and “disrupted nearby final exams.”⁷⁶ The group eventually
5 marched to the Kerckhoff Patio, where they again “set up an
6 unauthorized and unlawful encampment with tents, canopies, and
7 barricades with patio furniture,” “restricted access to the general
8 public,” and “enter[ed] Moore Hall, ... disrupt[ing] nearby final
9 exams.”⁷⁷ After more “dispersal orders,” rather than leaving
10 campus, “[t]he group then marched to the courtyard between Dodd
11 Hall and the School of Law,” known as Shapiro Courtyard, where
12 they again “set up another unauthorized and unlawful
13 encampment,” “restricted access to the general public in violation of
14 University policy,” and “disrupted nearby final exams.”⁷⁸

15 218. “As a result of the unauthorized and unlawful
16 encampments at the three locations, the group damaged the Shapiro
17 fountain, spray-painted brick walkways, tampered with fire safety
18 equipment, damaged patio furniture, stripped wire from electrical
19 fixtures, and vandalized vehicles.”⁷⁹

22 ⁷⁵ UCLA Police Department, *News Release: UCLA Police Department*
23 *Statement Regarding the Unlawful Encampments and Subsequent*
24 *Arrests on Monday, June 10, 2024*, UCLA (June 10, 2024, 10:30 PM),
<https://perma.cc/7M92-6X8G>.

25 ⁷⁶ *Id.*

26 ⁷⁷ *Id.*

27 ⁷⁸ *Id.*

28 ⁷⁹ *Id.*

1 219. The following day, Defendant Braziel sent out a campus-
2 wide email alert providing additional details about the June 10
3 encampment.⁸⁰ Calling the encampment “demonstration activity,”
4 Braziel recognized that the encampment once again “resulted in
5 violence, destruction of property and the blocking of student access
6 to parts of campus. ... These actions also prevented students from
7 completing their final exams.”⁸¹

8 220. Braziel’s email went on to describe how the “activity”
9 involved a series of violent attacks and vandalism, including
10 “dy[ing] the water in Shapiro Fountain red, us[ing] water-filled
11 barriers and chicken wire to block the area, us[ing] amplified sound,
12 and set[ting] up tents and canopies.”⁸²

13 221. Rather than taking swift action, these protesters were
14 simply told to “disperse.”⁸³ They did not. Instead, they “moved to
15 Kerckhoff patio carrying wooden shields,” where they “proceeded to
16 vandalize property with permanent red paint and erected barriers
17 that blocked students and the public from accessing that part of
18 campus.”⁸⁴

19 222. Simultaneously, “another group at Moore Hall” disrupted
20 final exams.⁸⁵
21

22 ⁸⁰ Rick Braziel, *Condemning Monday’s Violence On Campus*, UCLA
23 Newsroom (June 11, 2024), <https://perma.cc/5WLJ-3WUG>.

24 ⁸¹ *Id.*

25 ⁸² *Id.*

26 ⁸³ *Id.*

27 ⁸⁴ *Id.*

28 ⁸⁵ *Id.*

1 223. Following their exclusionary policies yet again, UCLA
2 simply told the Kerckhoff protesters to “disperse.”⁸⁶ And again, they
3 did not, instead “mov[ing] to an area near Dodd Hall,” which
4 “resulted in some students having to miss finals because they were
5 blocked from entering classrooms” and “some students [needing] to
6 be evacuated in the middle of taking their final exams.”⁸⁷

7 224. Amid the melee, an activist attacked UCLA’s Chabad rabbi
8 while others called him a “Zionist pedophile rabbi,” “not [a] human
9 being[.]” and a “fucking fake-ass Jew[.]” The masked activist told the
10 Rabbi “If I show you [my] face, I’m going to have to fucking kill you.”
11 When asked “is this a threat,” the activist responded “you can take
12 it however you want to take it man, ok. Fucking idiot.” When the
13 Rabbi sought assistance from nearby police, he was told “our main
14 concern is the crowd control.”

15 225. Meanwhile, as Defendant Beck walked through campus, he
16 required the presence of armed security as activists were shouting,
17 “fuck you” and “you’re not safe.”

18 **F. Antisemitic Chaos Continues in the New Semester**

19 226. The groups who organized the spring encampments
20 continued to engage in and prepare for continued “escalation” and
21 “resistance.”

22 227. Anticipating more disruptions this fall, Defendant Braziel
23 has stated that he spent the “summer months to run through
24 various scenarios with the senior leadership and experts to

27 ⁸⁶ Id.

28 ⁸⁷ Id.

1 proactively put strategies in place to respond to potential civil
2 unrest.” Braziel Decl., ECF 62-5 ¶ 31.

3 228. On September 19, 2024, the Regents of the University of
4 California adjourned the opening session of their September
5 gathering after activists from those same groups disrupted the
6 meeting and activists refused to comply with a Regents’
7 spokesperson’s orders to exit the meeting and law enforcement was
8 ultimately called in.

9 229. Then, starting on October 7, 2024, the one-year anniversary
10 of Hamas’s horrific attack, the same groups behind the encampment
11 instituted a “Week of Rage.”
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230. Figures 19 and 20 show public posts by an arm of UCLA's student government, the Cultural Affairs Commission, promoting the Week of Rage and celebrating the October 7 Hamas attack, that were posted on the Commission's public Instagram page which it uses to promote sponsored events.⁸⁸



Figure 19



Figure 20

231. That same day, activists held a rally that included a largely masked march through campus, starting at Dickson Court North and ending at Murphy Hall. At various points attendees gathered to hear speeches before proceeding on with chanting and the use of amplified sound equipment. The protest did not comply with UCLA's time, place, and manner policies. It also included antisemitic behavior similar to earlier protests, including the kicking down of

⁸⁸ @culturalaffairs, Instagram Story (October 7, 2024).

1 Israeli flags “placed to commemorate the lives lost during the Oct.
2 7, 2023, attacks,” chants of “Israel is a terrorist state” and “From the
3 river to the sea, Palestine will be free,” and the trampling of Israeli
4 flags.

5 232. On October 21, 2024, activists set up yet another
6 encampment, this time on Dickson Court, adjacent to Royce Quad.
7 This new encampment did not comply with UCLA’s time, place, and
8 manner policies.

9 **G. F. Yitzchok Frankel**

10 233. 179. Yitzchok Frankel is a third-year law student ~~who~~
11 ~~completed his second year~~ at UCLA School of Law ~~in the Spring of~~
12 ~~2024.~~

13 234. 180. Frankel is an Orthodox Jew, and has been so for his
14 whole life.

15 235. 181. Frankel is also the descendant of Holocaust survivors
16 on both sides of his family. His family was so severely impacted by
17 the Holocaust that only four members of his paternal grandfather’s
18 family survived.

19 236. 182. Consistent with his Orthodox Jewish faith, Frankel
20 keeps kosher, strictly observes Shabbat and all Jewish holidays, and
21 wears a kippah.

22 237. 183. Frankel and his wife are also dedicated to raising their
23 four children in the Jewish faith and send them to Orthodox Jewish
24 schools. The Frankel family regularly attends synagogue in the Los
25 Angeles area.

26 238. 184. Frankel attended Orthodox Jewish day schools for his
27 primary education and completed his undergraduate degree at
28

1 Yeshiva University—a leading Orthodox Jewish institution of
2 higher learning in the United States.

3 239. ~~185.~~ After completing his undergraduate degree, Frankel
4 worked at an Orthodox Jewish boys school, YULA High School, in
5 Los Angeles for five years, and completed an online masters degree
6 from Yeshiva University.

7 240. ~~186.~~ Frankel has strong ties to Israel. He has visited Israel
8 approximately eight times, including one trip where he spent six
9 weeks studying the Talmud at a yeshiva.

10 241. ~~187.~~ Each time Frankel journeys to Israel, he visits the
11 *Kotel*—the only remaining vestige of the Temple destroyed by the
12 Roman Empire in 70 CE along with the rest of Jerusalem. While
13 there, he engages in “tearing *kriah*,” the ritualistic act of rending
14 one’s garments as an act of mourning for the destruction of the
15 Jewish Temple.

16 242. ~~188.~~ Frankel seeks to follow Jewish law (*halacha*), which
17 prohibits speaking ill of or defaming the land of Israel. *See, e.g.,*
18 Rabbi Eliezer Melamed, *Peninei Halakhah*, The Nation and the
19 Land 3:11; *see also* Talmud Bavli, *Erchin* 15a (describing
20 punishment meted out for speaking ill of the land of Israel); Talmud
21 Bavli, *Ketubot* 112a-112b (describing precautions taken by rabbis to
22 ensure that no ill would be spoken of the land of Israel). Thus,
23 Frankel believes, as a matter of his religious faith, that he must
24 support Israel.

25 243. ~~189.~~ Like many other Jews around the world, Frankel also
26 engaged in a ritual at his wedding that marks the connection
27 between all Jews and Israel: as the bridegroom, he crushed a glass
28 with his foot at the end of the wedding ceremony. This is meant to

1 symbolize and recall to memory the destruction of the Temple in
2 Jerusalem by the Roman Empire. Immediately before Frankel broke
3 the glass, those assembled sang “If I forget you, Yerushalayim, let
4 my right hand forget how to work. Let my tongue stick to the roof of
5 my mouth if I do not remember you. If I do not set Yerushalayim
6 above my chiefest joy.” For this reason, too, Frankel cannot disavow
7 his connection to Israel.

8 244. ~~190.~~ Frankel also engages in the daily *Amidah* prayer
9 petitioning for the coming of the Messiah and the return of all Jews
10 to Israel. To Frankel, these prayers emphasize that all Jews,
11 whether living in Israel or abroad, have a religious duty to support
12 Israel.

13 245. ~~191.~~ Frankel is a vice president for the Jewish Law
14 Students Association which, among other things, bakes pastries for
15 Jewish holidays, holds Shabbat dinners, and occasionally gathers to
16 study Torah.

17 246. ~~192.~~ After the October 7 attacks, Frankel began to wear a
18 shirt depicting an American and Israeli flag nearly every day as a
19 sign of his support for Israel and his Jewish identity.

20 247. ~~193.~~ Frankel began to notice a rise in antisemitic activity
21 on UCLA’s campus after October 7, 2023.

22 248. ~~194.~~ Frankel observed on repeated occasions that “Bring
23 Them Home” posters depicting the names and faces of hostages
24 kidnapped and tortured by Hamas had been torn down, including
25 posters displayed in areas specifically reserved for the Jewish Law
26 Students Association.

1 249. ~~195.~~ On information and belief, despite Frankel's reporting
2 these incidents to the administration, UCLA has not taken any
3 action against these individuals.

4 250. ~~196.~~ Frankel also frequently observed individuals wearing
5 "anti-Zionist social club" t-shirts.

6 251. ~~197.~~ Frankel was also present at UCLA School of Law on
7 November 8 and November 21, 2023, when large numbers of
8 activists took over the law ~~school and its~~ school's courtyard, chanting
9 antisemitic phrases like "there is only one solution, *intifada*
10 revolution," and carrying signs.

11 252. ~~198.~~ Frankel also reported an antisemitic incident that took
12 place on April 18, 2024, after another student accused him of
13 harassing other students on campus merely because he was wearing
14 a kippah and a shirt showing an American and Israeli flag. Frankel
15 reported this incident to UCLA's Office of Equity, Diversity, and
16 Inclusion, part of the Civil Rights Office. On April 26, after the
17 encampment had formed, he met with UCLA Law Associate Dean of
18 Students Benito Nieves via Zoom to discuss the April 18 incident. In
19 response, Dean Nieves merely promised to "shar[e]" Frankel's
20 "reflections with [his] colleagues in the UCLA Office of Equity,
21 Diversity, and Inclusion" and shared general counselling resources
22 with him. To Frankel's knowledge, no action was taken against the
23 student.

24 253. ~~199.~~ Frankel was also directly impacted by UCLA's refusal
25 to dismantle the initial Jew Exclusion Zone.

26 254. ~~200.~~ Frankel frequently traverses Royce Quad to get from
27 the law school to other locations on campus, including Kerckhoff
28

1 Coffeehouse and other food establishments, and to purchase items
2 from the campus store.

3 255. ~~201.~~ Frankel also frequently walks around Royce Quad in
4 between classes, sometimes to take breaks, other times while
5 engaged in long telephone conversations—~~or,~~ such as when
6 ~~meetings~~speaking with his law school mentee.

7 256. ~~202.~~ Frankel has also brought his young children to Royce
8 Quad on numerous occasions to socialize as a family.

9 257. ~~203.~~ Because of the establishment of the Jew Exclusion
10 Zone and his knowledge that he could not go through the initial
11 encampment without violating his faith by disavowing Israel,
12 Frankel ceased all of these activities.

13 258. ~~204.~~ Frankel was the direct recipient of antisemitic
14 harassment resulting from the initial encampment.

15 259. ~~205.~~ On April 25, 2024, the first day the encampment was
16 in place, Frankel attended a peaceful rally held by Jewish students
17 and other protesters who support Israel's right to exist. There, he
18 observed the barricades that were set up on the north and east of
19 the encampment, including plywood and metal barriers.

20 260. ~~206.~~ While he was there, a masked female student came
21 ~~up~~out from the encampment and stood behind the group of Jewish
22 students and Israel supporters. She stood fairly close to Frankel,
23 holding a sign with an inverted red triangle in his face.

24 261. While near the encampment, Frankel also heard chants
25 from encampment activists including “this is the final solution,”
26 “intifada revolution,” and “from the River to the Sea.” He became
27 aware of Death to Zionism spray paint and a chalking with the
28 words “Step here” next to the Israeli flag.

1 262. ~~207.~~ Later, masked participants in the encampment left the
2 encampment and surrounded these observers, including Frankel,
3 tearing at their signs and pushing them.

4 263. ~~208.~~ Security not only failed to intervene, it actively
5 assisted the encampment participants.

6 264. ~~209.~~ A Frankel witnessed a UCLA security guard
7 **brought**~~bring~~ out metal barricades and ~~directed~~direct other staff to
8 set up the barricades around the encampment protesters—in effect
9 expanding the protected area of the encampment and leaving
10 Jewish students including Frankel stranded inside.

11 265. ~~210.~~ A line of security guards wearing blue shirts and
12 mounted on bicycles also sat idly by, refusing to intervene.

13 266. ~~211.~~ Later, three masked female students holding a
14 triangular red bike light stood in front of Frankel, mocking him and
15 taking pictures.

16 267. ~~212.~~ Frankel knew that he could not approach the
17 barricades and walk through the encampment without disavowing
18 Israel's right to exist in direct contravention of his Jewish faith.

19 268. ~~213.~~ On April 28, 2024, Frankel again participated in a rally
20 near the encampment with other Jewish students.

21 269. ~~214.~~ Again, masked participants from the encampment left
22 the encampment and flanked the protesters, beginning to yell, push,
23 and shove.

24 270. ~~215.~~ As was the case in the April 25, 2024, encounter with
25 the encampment, security did nothing to intervene.

26 271. Frankel also became aware of several violent incidents
27 targeting Jews that occurred in and near the encampment on April
28 28. As he was walking away from the encampment on April 28, he

1 helped one of his friends find paramedics after she had been pepper-
2 sprayed by someone from the encampment. He also learned of a
3 widely reported incident where a young woman was knocked to the
4 ground by individuals associated with the encampment and had to
5 go to the hospital.

6 272. Frankel continued to be impacted by the subsequent
7 encampments that cropped up during May and June of 2024, which
8 attempted to exclude Jews from parts of campus.

9 273. For instance, Frankel was speaking with a friend over
10 Zoom who was at the law school as activists swarmed into UCLA
11 Law's Shapiro courtyard on June 10, 2024. He watched the violent
12 take-over of the law school courtyard through the Zoom video call in
13 real time. This incident confirmed to Frankel that he remained
14 unsafe on campus and that UCLA had not committed to ensuring
15 his safe access as a Jewish student to all generally available parts
16 of campus.

17 274. Likewise, Frankel became aware that on June 10, 2024,
18 Defendant Beck needed to be escorted throughout campus with
19 armed guards as activists threatened him. To Frankel, the fact that
20 one of UCLA's leaders needed such intense security only reiterated
21 that he, as a Jewish student, remained unsafe on campus.

22 275. Frankel also became aware of the widely reported video of
23 a Rabbi being mistreated on June 10, 2024. This incident was
24 particularly disturbing to Frankel, as he had previously participated
25 in a Channukah Menorah lighting with this same Rabbi along with
26 his children, in the very same law school courtyard that was taken
27 over by activists.
28

1 276. UCLA’s refusal to take swift action to dismantle these
2 encampments, or to take a clear stand against the exclusion and
3 discrimination of Jews, continued to impact Frankel’s ability to
4 access campus throughout the summer of 2024.

5 277. For instance, as a member of the Jewish Law Students
6 Association board, Frankel was contacted by email by the Director
7 of Student Life at the Law School, asking whether the board “would
8 want to participate in hosting a lunch gathering for 1Ls on one day
9 from August 16-22.”

10 278. Under ordinary circumstances, Frankel would have leapt at
11 the chance to participate in this event. Frankel’s Jewish identity and
12 religion are integral to who he is, and he believes it is important to
13 mentor incoming students and encourage them to be proud of their
14 Judaism, too. He believes this is especially crucial now, given the
15 heinous attacks taking place against Jews across the country, in Los
16 Angeles, and on campus.

17 279. However, given UCLA’s continued refusal to ensure the
18 safety of Jewish students, he felt compelled to decline because he did
19 not feel safe participating in this event.

20 280. Under ordinary circumstances, Frankel also would have
21 traveled to campus before the beginning of classes to purchase
22 textbooks from the campus bookstore. However, due to the concerns
23 over his safety (caused by UCLA’s refusal to protect Jewish
24 students), he felt pressured to refrain from making these early
25 purchases.

26 281. UCLA’s failures have also continued to negatively impact
27 Frankel’s family. Last year, on July 2, 2023, Frankel’s family
28 traveled to campus to purchase UCLA-branded baby clothing in

1 anticipation of the birth of their youngest son. This campus trip was
2 just one of many times that he proudly brought his family to campus
3 so his children could experience and understand Frankel's studies
4 and how he is working to provide for them.

5 282. While there, Frankel and his family took a picture in front
6 of the "Bruin Bear" in Bruin Plaza to commemorate the occasion and
7 to memorialize their happiness at learning that a new baby boy
8 would soon be joining their family.

9 283. At the time, Frankel and his family planned to return to
10 campus after the birth of their son to visit the on-campus botanical
11 gardens and to re-create the photo—this time with the newest
12 member of the family in tow.

13 284. Bruin Plaza has since been the site of demonstrations by
14 the groups that instigated the encampments and the Jew Exclusion
15 Zone.

16 285. Therefore, as a father and husband, Frankel determined
17 that he could never put his family—particularly his young
18 children—at risk by bringing them to campus. This fear was driven
19 by the knowledge that, should anything happen to them, UCLA
20 would not intervene. They accordingly cancelled the trip and
21 abandoned this plan to make family memories.

22 **H. ~~G.~~ Joshua Ghayoum**

23 286. ~~216.~~ Joshua Ghayoum is a UCLA ~~sophomore~~ junior studying
24 history and pre-law. Ghayoum is Jewish and the child of Persian
25 immigrants who came to the United States fleeing antisemitism in
26 Iran.

1 287. ~~217.~~ Ghayoum grew up learning Judaism from his family
2 and attended Hebrew school from age five through thirteen, when
3 he had his bar mitzvah.

4 288. ~~218.~~ Ghayoum has visited Israel on three different
5 occasions. He ~~plans~~planned to return a fourth time this past
6 summer as part of the Onward Birthright program, which aims to
7 “create a long-lasting connection with Israel and to make the strong
8 commitment to Jewish life and community that future generations
9 depend on,” but was unable to do so because of the ongoing war.

10 289. ~~219.~~ Ghayoum has family and a significant number of
11 friends who live in Israel and a significant interest in Israel’s
12 religious sites. He considers Israel a second home.

13 290. ~~220.~~ Ghayoum observes the religious tenets of Judaism
14 including observing Shabbat, attending synagogue weekly, and
15 keeping the Jewish holidays.

16 291. ~~221.~~ Since he was 13, Ghayoum has worn a necklace that
17 displays a Star of David.

18 292. ~~222.~~ For Ghayoum, support for Israel is both a religious
19 obligation and part of his ethnic cultural identity. For these reasons,
20 he cannot forswear Israel and its right to exist.

21 293. ~~223.~~ Ghayoum is a member of UCLA’s Jewish fraternity,
22 Alpha Epsilon Pi. The fraternity’s building is adorned with a Star of
23 David and a mezuzah hangs on the doorpost.

24 294. ~~224.~~ Members of Alpha Epsilon Pi observe Jewish holidays
25 together. For example, they frequently host Shabbat dinners and
26 annually construct a Sukkah.

1 295. ~~225.~~ The fraternity often hosts UCLA's Chabad rabbi at the
2 fraternity's house to pray, discuss Jewish history, and spend time
3 together.

4 296. ~~226.~~ Ghayoum is closely involved with the Persian
5 Community at Hillel (PCH), a subgroup of UCLA's chapter of Hillel.
6 Ghayoum observes Shabbat along with other members of the PCH
7 community and attends other Jewish events.

8 297. ~~227.~~ Ghayoum chose to attend UCLA for its prestigious
9 reputation, but his relationship with Royce Quad began long before.

10 298. ~~228.~~ As an area resident living near UCLA, Ghayoum often
11 traveled to Royce Quad with his family to play soccer, throw frisbees,
12 play on scooters, and engage in other social activities with family
13 and friends.

14 299. ~~229.~~ Ghayoum and his family took pictures at Royce Quad
15 to commemorate a sibling's bar mitzvah.

16 300. ~~230.~~ Beginning after Hamas's vicious attack on Israel,
17 Ghayoum witnessed numerous raucous anti-Israel demonstrations,
18 which often included antisemitic chants.

19 301. ~~231.~~ These demonstrations normally started at the bottom
20 of the Janss Steps and went up through Royce Quad, the same area
21 where the encampment would later be set up.

22 302. ~~232.~~ During these demonstrations, Ghayoum repeatedly
23 heard chants of "from the River to the Sea, Palestine will be free"
24 and "this is the final solution."

25 303. ~~233.~~ Ghayoum also witnessed demonstrators tearing down
26 posters showing Jewish hostages of Hamas.

27 304. ~~234.~~ Ghayoum experienced the effects of these
28 demonstrations personally.

1 305. ~~235.~~ In early December 2023, the UCLA PD informed Alpha
2 Epsilon Pi that it should consider hiring private security for a party
3 it planned to host on December 6. The fraternity hired private
4 security, and UCLA police officers ended up standing outside the
5 fraternity house for the duration of the party.

6 306. ~~236.~~ Even though anti-Israel protests were common,
7 Ghayoum actively and proudly voiced his opposition to these anti-
8 Jewish sentiments, challenging students who were expressing anti-
9 Jewish views.

10 307. ~~237.~~ Ghayoum ~~has~~was personally ~~been~~ impacted by UCLA's
11 initial segregationist encampment.

12 308. ~~238.~~ On one occasion while he was near the initial
13 encampment, Ghayoum heard activists chanting "death to Israel"
14 and "death to Jews."

15 309. Ghayoum also saw swastikas on signs and graffiti,
16 including an individual holding a sign with a swastika, followed by
17 an equals sign, followed by the Israeli flag.

18 310. Ghayoum also saw instances where the sidewalks were
19 chalked with a star of David accompanied by the text, "Step Here."

20 311. ~~239.~~ Ghayoum was stopped twice at encampment
21 checkpoints while attempting to enter Powell Library and to access
22 Ackerman Union.

23 312. ~~240.~~ On the first occasion, while attempting to get to Powell
24 Library to study for his midterms, Ghayoum encountered a massive
25 barricade made of plywood boards and metal barriers that was
26 flanked by security. A security guard informed Ghayoum that he
27 could not proceed past the barricade. Ghayoum walked to the other
28

1 end of the barricade, only to be confronted by a second security guard
2 who gave the same instruction.

3 313. ~~241.~~ Both security guards wore yellow vests reading “CSC.”

4 314. ~~242.~~ Based on knowledge of the encampment’s lawlessness,
5 Ghayoum knew that if he jumped the barricade, he risked facing
6 violence. So he abandoned his plans to study in the library
7 altogether.

8 315. ~~243.~~ On a second occasion, Ghayoum attempted to meet a
9 friend at Ackerman Union. He had made his way through
10 approximately two-thirds of the occupied area, and was approaching
11 Janss Steps, when he was stopped by a male approximately in his
12 early twenties and told he could not proceed without showing a red
13 wristband.

14 316. ~~244.~~ Ghayoum attempted to continue walking, but the
15 individual signaled for three other male individuals of the same
16 approximate age to join him. The four men stood in a line in front of
17 Ghayoum, repeatedly demanding to see his hands and wristband
18 and telling him he could not walk down Janss Steps.

19 317. ~~245.~~ The four men aggressively walked toward Ghayoum,
20 forcing him to walk backward away from the Steps. Occasionally,
21 the activists made physical contact with Ghayoum.

22 318. ~~246.~~ Ghayoum felt as though, had he continued to walk
23 forward, the four activists would have physically stopped him, and
24 he felt confident that they would have also called in reinforcements.

25 319. ~~247.~~ Disavowing Israel would be a betrayal of Ghayoum’s
26 Jewish faith.

27 320. ~~248.~~ Knowing that the situation would escalate if he
28 continued to assert his rights, Ghayoum abandoned his effort and

1 cancelled the meeting with his friend. He also understood that any
2 further attempts to access the Jew Exclusion Zone would be futile.

3 321. ~~249.~~ The presence of the encampment limited Ghayoum's
4 access to the undergraduate library. He generally uses the library
5 as a resource and a place for solo and group study. But because the
6 encampment members blocked access to the library, Ghayoum was
7 not able to use the library to study for midterm exams.

8 322. ~~250.~~ Ghayoum also witnessed firsthand support by UCLA
9 faculty of the encampment. In an email sent on April 30, 2024,
10 Ghayoum's history professor stated that he would hold additional
11 "office hours ... across from the encampment, if there is some space"
12 because he wished to "give students holding down the encampment
13 a chance to meet with me." If a student, such as Ghayoum, did not
14 "feel comfortable coming in close proximity to th[e] encampment,"
15 such a student was required to contact the professor separately to
16 set up an appointment.

17 323. ~~251.~~ That same professor later scheduled a "teach-in at or
18 near the site of the encampment" in lieu of having class. He stated
19 that students were not required to attend, explaining that "I know
20 there are folks so traumatized by the fascist/zionist/police assaults
21 on those very grounds that returning can be triggering."

22 324. ~~252.~~ As a result of the encampment, Ghayoum feels that it
23 is no longer safe to voice opposition to activists expressing anti-
24 Jewish sentiments, and thus he has in fact ceased doing so. For
25 instance, when discussion over a class group project turned to
26 criticizing Israel for its "genocide," Ghayoum opted to stay silent
27 rather than express his views.
28

1 325. ~~253.~~—The encampment directly affected Ghayoum’s class
2 attendance.

3 326. ~~254.~~—Ghayoum ~~has~~had one class located in Haines Hall,
4 which abuts Royce Quad. Thus, to attend class, Ghayoum ~~would~~
5 ~~need~~needed to directly confront the encampment and its activists.

6 327. ~~255.~~—Because of his class’s close proximity to the
7 encampment, the encampment’s overall threatening atmosphere,
8 and his knowledge that he could not pass through the encampment
9 due to his Judaism, Ghayoum was forced to miss at least four days
10 of class, opting instead to listen to class recordings.

11 328. ~~256.~~—The intimidating atmosphere of the encampment
12 meant that Ghayoum did not wish to enter campus at all.

13 329. Ghayoum has continued to be impacted by the May and
14 June encampments.

15 330. Ghayoum has continued to stifle his pro-Israel speech in
16 light of these encampments.

17 331. Ghayoum also felt particularly horrified watching the video
18 of the Chabad Rabbi being attacked, as this Rabbi frequently meets
19 with Josh’s fraternity for faith events.

20 **I. H. Eden Shemuelian**

21 332. ~~257.~~—Eden Shemuelian is a first-generation undergraduate
22 and graduate student. She attended UCLA as an undergraduate
23 and ~~completed her second year~~is a third-year law student at UCLA
24 School of Law ~~in the Spring of 2024.~~

25 333. ~~258.~~—Shemuelian is Jewish and grew up learning about and
26 participating in her faith by attending Hebrew school, becoming a
27 bat mitzvah, celebrating Jewish holidays, and observing Shabbat.
28

1 334. ~~259.~~ After her bat mitsvah, Shemuelian continued her
2 involvement by teaching Hebrew to younger children each Sunday.

3 335. ~~260.~~ Shemuelian continues to observe Jewish holidays and
4 Shabbat, and attends synagogue with her family.

5 336. ~~261.~~ Shemuelian wears a Star of David pendant as a sign of
6 her religious faith and commitment to the Jewish people.

7 337. ~~262.~~ Shemuelian's father is Israeli, and she has family in
8 Israel.

9 338. ~~263.~~ Shemuelian has learned a lot about her Jewish faith
10 on her regular trips to visit her family in Israel, including on a 2018
11 Birthright trip, where she visited cultural and religious sites
12 important to the Jewish people.

13 339. ~~264.~~ Israel is at the core of Shemuelian's Jewish identity.
14 ~~Israel represents~~ representing the homeland of the Jewish people,
15 given to them by God and set aside for them for thousands of years.

16 340. ~~265.~~ For Shemuelian, Judaism is synonymous with
17 supporting Israel. ~~To,~~ and to be a faithful Jew means to support the
18 right of Israel to exist.

19 341. Shemuelian continues her involvement with Judaism by
20 being a member of the Jewish Law Students Association at UCLA.

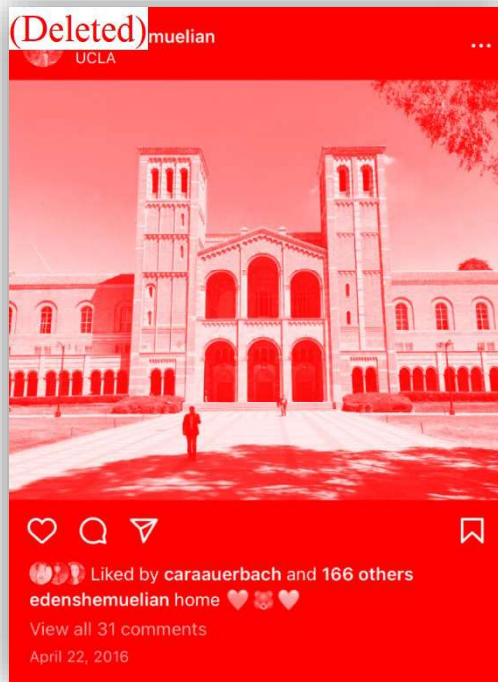
21 342. ~~266.~~ Shemuelian decided to attend UCLA as an
22 undergraduate after making a campus visit and falling in love with
23 its beauty.

24 343. ~~267.~~ In particular, Royce Quad stood out to Shemuelian as
25 an iconic representation of UCLA's beautiful architecture and spirit
26 of camaraderie.

27 ##

##

344. ~~268.~~ Figure ~~182~~1 is a picture Shemuelian took of Royce Hall while touring UCLA's campus in 2016.



~~Figure 18~~



Figure 21

345. ~~269.~~ Shemuelian decided to pursue her law degree at UCLA after spending her undergraduate years steeped in UCLA's rigorous academics and its strong sense of collegiality.

346. ~~270.~~—That sense of collegiality carried over into Shemuelian's first year of law school, but evaporated quickly beginning after October 7, 2023.

347. ~~271.~~ After October 7, 2023, Shemuelian began to witness an increase in antisemitic activity on campus, alongside a corresponding lack of interest by faculty and administration to put it to an end.

348. ~~272.~~ Protests regularly took place at UCLA's law school, replete with antisemitic language and imagery. These protests included chants like "From the river to the sea, Palestine will be

1 free,” “There is only one solution, intifada revolution,” and “UCPD,
2 KKK, IDF, they’re all the same.”

3 349. 273.—On many occasions, Shemuelian saw swastikas on
4 campus, including one engraved into a table in the law school’s
5 courtyard.

6 350. 274.—On October 30, 2023, two activists ripped down “bring
7 them home” posters that Shemuelian and her friends had hung near
8 the law school featuring the names and faces of the hostages
9 kidnapped and held in captivity by Hamas. Shemuelian saw these
10 posters ripped down on multiple other occasions, including when
11 posters were hung on bulletin board space dedicated to the Jewish
12 Law Students Association.

13 351. 275.—On November 8, 2023, hundreds of ~~agitators~~activists—
14 many of them masked—swarmed into the law school and took over
15 the building. They chanted various slogans including “death to
16 Israel,” “death to Jews,” “there is only one solution,” “*intifada*,” and
17 “from the River to the Sea” while standing approximately ten feet
18 away from Shemuelian.

19 352. 276.—After this protest, Shemuelian wrote to Michael
20 Waterstone, the Dean of the School of Law, copying Chancellor
21 Block and the Student Affairs Office. The email described the
22 protest and poster vandalism in detail, explaining that these events
23 left Shemuelian and other Jewish students “shaking, crying, unable
24 to breathe, and dizzy.”

25 353. 277.—The email continued: “this school has not been a safe
26 space for me and my Jewish peers for the past few weeks. I chose to
27 attend this university to receive an education. If I had known I
28 would be faced with extreme antisemitism on a daily basis, I would

1 have committed elsewhere. I have not been able to sit in class and
2 learn for the past 34 days, especially when these students sit behind
3 me in my classes four days a week with their Palestinian
4 resistance/terrorist scarves (and only seconds before class is to
5 begin, they are chanting for the genocide of my people).”

6 354. 278. Shemuelian also stated that because of this and other
7 protests, she did not feel safe to attend class in person, opting
8 instead to attend her lectures online.

9 355. 279.—The email identified specific students who had
10 participated in the protests and who had previously torn down
11 hostage posters.

12 356. The email also attached a chant sheet used by the activists
13 during the November 8 disruption. These included “There is only
14 one solution” with the response phrase “Intifada revolution,”
15 “Israel, Israel you will learn” with the response chant “By the
16 millions we’ll return!,” and “1-2-3-4 (occupation no more/open
17 up the prison doors!), 5-6-7-8 (Israel is a terrorist state!).”

18 357. 280.—Later in the email exchange, Dean Waterstone
19 ~~also~~ confirmed that he had forwarded the email to UCLA’s Dean of
20 Students, Jasmine Rush, since “this type and the handling of these
21 incidents happens at the University level.” The Dean of Students
22 “confirmed receipt” of the email.

23 358. 281.—On information and belief, none of these students was
24 ever punished.

25 359. 282.—Because no action was taken, Shemuelian ceased
26 attending any of her classes in person because of the fear and
27 intimidation caused by hearing antisemitic chants every time she
28 entered the school. Instead, she was compelled to watch her classes

1 through recorded lectures, which severely compromised her ability
2 to study and to participate in UCLA life.

3 360. Shemuelian wrote multiple emails to her professors
4 explaining why she felt compelled to no longer attend class in
5 person, explaining that “it is hard for me to sit in class and focus
6 when I feel uncomfortable and unsafe on campus as a Jewish
7 student.”

8 361. ~~283.~~ Shemuelian also severely curtailed the number of
9 hours she worked for the Ziffren Institute for Media, Entertainment,
10 Technology & Sports Law at the law school.

11 362. On November 29, 2023, Shemuelian contacted Bayrex
12 Martí, the Assistant Dean of Student Affairs at UCLA Law, along
13 with Michael Waterstone and others, after she saw a post on X while
14 she was walking to study for finals at the library. The post shows
15 two pictures of what appear to be anti-Israel protestors holding
16 knives in their hands that are by their sides while standing and
17 walking out in the open on campus.

18 363. Dean Martí provided only a generic response, passing
19 Shemuelian off to other campus departments and giving no
20 assurances that the school would take action to investigate or to
21 ensure the physical safety of Jewish students. When Shemuelian
22 replied asking for follow up, she received no response.

23 364. She also discussed this situation on a call with Benito
24 Nieves, Associate Dean of Students for UCLA Law, who also gave
25 no assurances of security, discipline, or investigation.

26 365. ~~284.~~ Shemuelian was also personally impacted by UCLA’s
27 initial Jew Exclusion Zone.
28

1 ~~366. 285.~~ The initial encampment's location on Royce Quad was
2 approximately a three-minute walk from the law school building.
3 Along with many other law students, Shemuelian frequently leaves
4 the law school and walks through Royce Quad to access other parts
5 of campus, including to get food and coffee at other campus locations.

6 ~~367. 286.~~ Because of Royce Quad's central location, and her
7 affinity for the space that developed as an undergrad, Shemuelian
8 also frequently takes study breaks to walk around Royce Quad to
9 get some exercise and fresh air.

10 ~~368. 287.~~ Additionally, Shemuelian still occasionally chooses to
11 study at Powell Library because of the fond undergraduate
12 memories associated with that study space. Because of the
13 encampment and her knowledge that Jewish students were being
14 denied access to Royce Quad and academic buildings, Shemuelian
15 ceased all of this activity, opting instead to stay home or to not leave
16 the law school at all.

17 ~~369. 288.~~ On April 26, 2024, Shemuelian attempted to observe
18 the encampment and its activities. Shemuelian approached the
19 barricade, joining other students wearing Jewish garb such as
20 kippahs and Stars of David or holding Israeli flags.

21 ~~370. 289.~~ While standing about three feet from the barricade,
22 she attempted to read the signs and hear the chants taking place
23 within the encampment. Shemuelian saw signs reading "Fuck
24 Israel" and "From the River to the Sea," and depicting red inverted
25 triangles—including on the encampment's "official" sign. She also
26 saw signs equating Israel and the Israeli Defense Force to the Ku
27 Klux Klan and white supremacy. Many of the activists inside the
28 encampment were masked.

1 371. ~~290.~~ Rather than ensuring that Jewish students and faculty
2 could pass safely through the areas to access Royce Quad, Powell
3 Library, Royce Hall, and other locations on campus, Shemuelian
4 witnessed security instead acting to stop individuals from passing
5 through.

6 372. ~~291.~~ Thus, security acted as a force multiplier for the
7 activists in the encampment.

8 373. ~~292.~~ For instance, a man in a light blue polo shirt that said
9 “Security Staff” with a logo depicting “CSC” who was standing on
10 the outside of the barricade began to chastise Shemuelian.

11 374. ~~293.~~ Though Shemuelian simply stood and watched
12 silently, the CSC staff member told her ~~that she either needed to~~
13 ~~come into the encampment and participate or leave the area.~~ “to
14 move away from the barricade and keep going unless you’re going
15 in.”

16 375. ~~294.~~ The CSC member told Shemuelian that he had “been
17 asked to keep this area [in front of the encampment] clear” and that
18 he was “not the ~~problem~~issue, you guys are.”

19 376. ~~295.~~ Additionally, a group of security guards sitting on
20 bikes and wearing blue shirts emblazoned with CSC mocked
21 Shemuelian and the other Jewish observers, laughing at a male
22 student singing in Hebrew who was yelled at by activists, jeering at
23 the students when they professed anger at not being able to pass
24 through, and repeatedly telling Shemuelian and the other Jewish
25 students that they needed to leave.

26 377. ~~296.~~ Shemuelian also witnessed a student wearing a kippah
27 and holding a pro-Israel sign being told by these same security
28 guards to leave the area near the encampment.

1 378. ~~297.~~ As a result of these actions by security, Shemuelian
2 was forced to leave the area.

3 379. ~~298.~~ Shemuelian knew that she could not pass through the
4 encampment without disavowing her beliefs about Israel, which she
5 could not do both as a matter of faith and as a matter of her ethnic
6 identity as a Jew.

7 380. Shemuelian's ability to study for final exams was severely
8 compromised due to initial encampment activity.

9 381. Unlike other academic departments and programs, the law
10 school did not cancel or suspend in-person classes or exams due to
11 the encampment.

12 382. Unlike other programs, which were still in regular class
13 session during the lead up to and existence of the encampment, the
14 law school was scheduled to hold final exams from April 29, 2024,
15 through May 9, 2024.

16 383. In a normal semester, Shemuelian would have spent many
17 hours in the law school and its library preparing for finals because
18 she is better able to focus there. However, she mostly avoided going
19 to campus to study because of the encampment.

20 384. ~~299.~~ On However, on April 28, 2024, Shemuelian did
21 attempt to access the library, but was again forced to confront the
22 encampment due to parking restrictions that prevented her from
23 parking near the law school.

24 385. ~~300.~~ Shemuelian had attempted to go to the law school to
25 study for a final exam that would take place on April 30, 2024.
26 Because of the parking restrictions, she was forced to park near the
27 encampment and to walk around the encampment to get to the law
28 school.

1 386. ~~301.~~ Here, too, Shemuelian knew she could not simply cut
2 through the encampment, because to do so would require her to
3 violate her faith by disavowing Israel's right to exist.

4 387. ~~302.~~ So instead, Shemuelian was forced to walk around the
5 encampment, with antisemitic chants ringing in her ears and
6 antisemitic signs in her face.

7 388. ~~303.~~ This experience severely and negatively impacted
8 Shemuelian's ability to study for her final once she reached the law
9 school library, where she could still hear the chanting from the
10 encampment.

11 ~~304. Shemuelian was also forced to walk near the encampment to~~
12 ~~attend one of her final exams.~~

13
14 ~~305. Unlike other academic departments and programs, the law school~~
15 ~~did not cancel or suspend in-person classes or exams due to the~~
16 ~~encampment.~~

17
18 ~~306. Unlike other programs, which were still in regular class session~~
19 ~~during the lead up to and existence of the encampment, the law school~~
20 ~~was scheduled to hold final exams from April 29, 2024, through May 9,~~
21 ~~2024.~~

22 ~~307. Shemuelian's ability to study for final exams was severely~~
23 ~~compromised due to encampment activity. She was forced to walk near~~
24 ~~the encampment to enter the law school, and her studies were routinely~~
25 ~~drowned out by the antisemitic chants rising from the encampment.~~

26 389. ~~308.~~ The ongoing encampment caused the entire finals
27 period to be pervaded with a sense of fear for Shemuelian, and she
28

1 felt that she and all Jewish students were unsafe and subject to
2 harm if they went anywhere near the encampment.

3 390. ~~309.~~ Because of the law school's proximity to the
4 encampment, Shemuelian also feared activists would enter the law
5 school building as well.

6 391. Shemuelian was also aware of incidents earlier in the week
7 when one of her Jewish friends was pepper sprayed by encampment
8 members, and her cousin was hit in the head near the encampment
9 and had to go to the hospital.

10 392. Most important, Shemuelian had read and kept up with all
11 the campus alerts and emails sent throughout the course of the
12 initial encampment. UCLA's refusal to take a stand against the Jew
13 Exclusion Zone, despite its knowledge of ongoing violence and the
14 exclusion of Jews from parts of campus, meant she had no confidence
15 that any UCLA official would intervene to guarantee her safety.

16 393. ~~310.~~ ~~The antisemitic activities taking place at the~~
17 ~~encampment~~ All of these circumstances caused Shemuelian to feel
18 immensely afraid as a Jewish student at the thought of needing to
19 cross by the encampment to attend her finals.

20 394. ~~311.~~ On May 1, 2024, Shemuelian raised these concerns to
21 several different law school deans, explaining she felt "unsafe"
22 coming to the law school for her final exam of the semester due to
23 the encampment's Jew Exclusion Zone and related protest activity
24 on campus.

25 395. ~~312.~~ But, despite the previous assurances that such
26 requests would be accommodated, Shemuelian's request was denied,
27 and her repeated entreaties for reconsideration were ignored. In
28 fact, Shemuelian did not receive a response to her final plea that she

1 not be subjected to the “violence and harassment” she feared by
2 being required to come to campus for the exam.

3 396. 313.—Because the law school administration never
4 responded to her final request, Shemuelian had to go to campus in
5 order to not miss her final exam.

6 397. UCLA’s failures to protect Jewish students continued to
7 impact Shemuelian long after the belated disbandment of the initial
8 encampment.

9 398. Shemuelian remained aware of the continued disturbances
10 and encampments on campus throughout May and June, including
11 those on May 5, May 23, and June 10, 2024. Through the campus-
12 wide alerts and social media, Shemuelian continued to observe
13 UCLA’s failure to protect Jewish students through its failure to take
14 swift action to dismantle the encampments and to condemn the
15 exclusion of Jews.

16 399. These negative impacts lasted throughout the summer as
17 well. Because UCLA continued to refuse to guarantee the full, equal,
18 and safe access of Jewish students to campus, Shemuelian opted to
19 refrain from many activities she otherwise would have engaged in.

20 400. For instance, because of her love for UCLA’s campus,
21 Shemuelian typically chooses to complete work for her summer jobs
22 from various on-campus facilities. During the summer of 2023, she
23 chose to work from the Shapiro Courtyard and the law school library
24 two to three times a week.

25 401. Especially since the violent occupation of Shapiro courtyard
26 on June 10, Shemuelian no longer felt safe venturing onto campus
27 at all, let alone to these spaces. She therefore refrained from setting
28

1 foot on campus during the summer break, as was previously her
2 typical custom.

3 402. UCLA's failure to remedy antisemitism also meant that
4 Shemuelian felt pressure not to provide orientation to friends who
5 were about to begin their first year at UCLA's law school. Initially,
6 Shemuelian had planned to show them around to her favorite places
7 on campus and to help get them excited about the upcoming year.
8 But because UCLA has refused to take action to guarantee her
9 safety and full access to campus, she no longer felt safe walking
10 around campus.

11 403. After her first year of law school, Shemuelian was asked to
12 participate in orientation activities for incoming law students, but
13 she was out of town and could not attend. She had hoped to
14 participate in similar orientation activities after completing her
15 second year, as she feels it is an important form of campus
16 involvement and mentoring. But because of UCLA's refusals to
17 address antisemitism, she did not feel that she could safely
18 volunteer for orientation.

19 **J. Dr. Kamran Shamsa**

20 404. Shamsa is currently an Associate Clinical Professor at
21 UCLA. Since 2011, he has been a member of the UCLA faculty in
22 the David Geffen School of Medicine and the Department of
23 Medicine/Division of Cardiology.

24 405. Prior to joining the faculty, Shamsa completed an
25 internship in Medicine/Pediatrics in 2005, a residency in Internal
26 Medicine/Pediatrics in 2008, and a fellowship in Adult
27 Cardiovascular Disease in 2011, all at the David Geffen UCLA
28 School of Medicine.

1 406. Shamsa spent four years on the campus of UCLA as an
2 undergraduate, attaining a Bachelor of Science in Physiological
3 Science in 1998. After graduation, he spent two additional years as
4 a research associate at UCLA.

5 407. All in all, Shamsa has spent 27 of the past 31 years as part
6 of the UCLA campus community.

7 408. When Shamsa was eleven years old, he immigrated to the
8 United States from Iran, fleeing systemic antisemitism.

9 409. Shamsa is an observant Jew. His Jewish faith and identity
10 are at the core of who he is.

11 410. Shamsa regularly attends services at Eretz Synagogue and
12 Cultural Center in Los Angeles, which includes a significant Persian
13 Jewish community.

14 411. As a matter of his Jewish faith, Shamsa supports Israel as
15 a homeland for Jews and its right to exist. His Jewish faith does not
16 allow him to forswear Israel.

17 412. Shamsa has been alarmed and troubled by the rising wave
18 of antisemitism that has swept across UCLA's campus, as well as
19 UCLA's complicity in allowing that antisemitism to grow and thrive.

20 413. On numerous occasions, Shamsa experienced firsthand
21 UCLA's failure to protect him and other Jewish faculty and students
22 from both the exclusionary encampments, and even from direct
23 violence.

24 414. On April 25, 2024, Shamsa attempted to enter the
25 encampment to see what was taking place inside.

26 415. As he approached, he was stopped by UCLA security guards
27 stationed outside the encampment and told he could not go in.
28

1 416. Behind the security guards, a group of activists were lined
2 side-by-side to stop anyone from the group of Jews standing outside
3 the encampment from entering the encampment.

4 417. Their faces were covered, and they were shouting anti-
5 Israel and anti-Jewish epithets and slurs at the Jewish crowd
6 outside the edge of the encampment.

7 418. The security guards did not intervene.

8 419. In the late morning on April 28, 2024, Shamsa walked from
9 the Ronald Reagan UCLA Medical Center toward Royce Quad after
10 finishing his scheduled round in the hospital performing cardiology
11 consultation.

12 420. On the main walkway on campus called Bruin Walk, he was
13 repeatedly harassed by various activists, who were holding signs
14 and intimidating anyone that they deemed not on their side.

15 421. As he neared Royce Quad to attend a pro-Israel rally, a
16 large, masked man approached him and aggressively pushed him to
17 the ground.

18 422. This occurred within plain sight of at least a dozen UCLA
19 security guards.

20 423. These security guards all witnessed what happened to him
21 but did nothing to intervene, did not pursue his assailant, and did
22 not make any attempt to help him get up from the ground as he lay
23 there flat on his back.

24 424. As a result, Shamsa's assailant simply walked away, as
25 though nothing had happened.

26 425. Shaken, Shamsa slowly rose and collected himself.
27
28

1 426. After walking approximately another 100 feet, a UCLA
2 security guard approached him, pushing against his chest with both
3 hands and telling him that no one could cross the plaza.

4 427. It was only after Shamsa displayed his faculty badge and
5 insisted on his right to cross to the counter-protest that he was
6 allowed to proceed.

7 428. On April 30, 2024, Shamsa watched the violence at the
8 encampment unfold on social media and through local TV coverage.

9 429. Appalled and made afraid by what he saw, he called the Los
10 Angeles Police Department, begging them to intervene.

11 430. He was told by the dispatcher that LAPD could not
12 intervene unless requested to do so by the UCLA Administration.
13 Then, the call was abruptly ended.

14 431. Shamsa then called the UCLA PD three times between
15 approximately 10:30 and 11:30 PM.

16 432. He explained that he was a UCLA faculty member and that
17 police were desperately needed at the encampment site to put a stop
18 to the rapidly escalating violence.

19 433. He was informed that UCLA PD would only intervene if
20 instructed by the UCLA administration to do so. Since they had not
21 received such orders, they would not assist.

22 **K. I-Relief needed**

23 434. ~~314.~~As set forth above, Defendants knowingly allowed
24 activists to establish a Jew Exclusion Zone on UCLA's campus for
25 several days during the spring quarter in 2024.

26 435. ~~315.~~Defendants had the ability to disband the
27 encampment, which violated stated University policies, but instead
28 chose to ~~allow it~~enact an exclusionary policy that allowed the

1 encampment to persist and to permit the exclusion of Jews from
2 parts of campus.

3 436. 316. Defendants had the ability to order UCLA PD and
4 private security officers to help Jewish students obtain equal access
5 to campus, but did not, and instead ~~reinforced the exclusion~~
6 ~~zone~~ chose to reinforce the Jew Exclusion Zone.

7 437. 317. Protest groups remain interested in reestablishing
8 their encampment in the near future, have publicly stated their
9 desire to do so, and have ~~recently attempted to do so~~ successfully
10 formed multiple encampments after the initial one was disbanded.

11 438. 318. As the Court has already found, Plaintiffs have been
12 harmed by Defendants' previous allowance of the Jew Exclusion
13 Zone on UCLA's campus ~~and~~. Meanwhile, Defendants have
14 remained steadfast in their position that they are free to exercise
15 their discretion to continue excluding Jews simply because they are
16 Jews, saying it would otherwise "hamstring" their ability to operate
17 campus. Absent the current preliminary injunction, Plaintiffs would
18 immediately face the same irreparable harm that they faced
19 immediately after the first encampment was dismantled.

20 439. Plaintiffs seek ~~an order~~ a permanent injunction from this Court
21 to be able to continue their educational and professional pursuits on
22 campus in peace and freedom.

23 440. 319. To know that they will be safe on campus, be free to
24 exercise their religion, and receive the equal protection of the laws,
25 Plaintiffs need ~~an order~~ a permanent injunction requiring
26 Defendants to ensure that no Jew Exclusion Zone will be allowed on
27 UCLA's campus, ~~both during the pendency of this case and beyond~~
28

1 and that Plaintiffs will be guaranteed equal access to campus
2 facilities.

3 **CLAIMS FOR RELIEF**

4 **Count I**

5 **42 U.S.C. § 1983**

6 **Equal Protection Clause**

7 441. ~~320.~~ Plaintiffs incorporate by reference the allegations set
8 forth in the preceding paragraphs.

9 442. ~~321.~~ Under the Fourteenth Amendment to the United
10 States Constitution, a State shall not “deny to any person within its
11 jurisdiction the equal protection of the laws.”

12 443. ~~322.~~ The Equal Protection Clause prohibits discrimination
13 on the basis of religion, race, and ethnicity.

14 444. ~~323.~~ Defendants have deprived Plaintiffs of equal
15 protection of the laws, as secured by the Fourteenth Amendment,
16 through a policy and practice that treats Plaintiffs differently than
17 similarly situated individuals because Plaintiffs are ethnically and
18 religiously Jewish.

19 445. ~~324.~~ Defendants have knowingly allowed private
20 individuals to bar Jewish persons from parts of the UCLA campus
21 because of their Jewish ethnicity and religion, while non-Jewish
22 persons are permitted access to all areas of campus. Indeed,
23 Defendants affirmatively assisted these actions by hiring private
24 security guards that reinforced the zone, refusing to enforce stated
25 policies that prohibited the zone, and instructing law enforcement
26 officers not to intervene.

27 446. ~~325.~~ Defendants furthered no legitimate or compelling state
28 interest by engaging in this conduct.

1 453. ~~332.~~ Government efforts to regulate speech based on the
2 “specific motivating ideology or the opinion or perspective of the
3 speaker” is a “blatant” and “egregious” form of impermissible speech
4 restriction. *Rosenberger v. Rector and Visitors of the Univ. of Va.*,
5 515 U.S. 819, 829 (1995).

6 454. ~~333.~~ And the government cannot “coerce an individual to
7 speak contrary to her beliefs on a significant issue of personal
8 conviction, all in order to eliminate ideas that differ from its own.”
9 *303 Creative v. Elenis*, 600 U.S. 570, 598 (2023).

10 455. ~~334.~~ Plaintiffs believe that Israel has the right to exist and
11 maintain a Jewish state in the Jewish ancestral homeland.

12 456. ~~335.~~ Plaintiffs were prohibited from accessing areas of the
13 UCLA campus because they expressed this viewpoint and refused to
14 disavow Israel.

15 457. ~~336.~~ By failing to guarantee Plaintiffs access to campus and
16 campus resources, and affirmatively aiding the denial of such
17 access, on the same terms as others based on their viewpoint,
18 Defendants engaged in viewpoint discrimination against Plaintiffs.

19 458. ~~337.~~ Moreover, by coercing Plaintiffs to confess a belief with
20 which they disagree, Defendants compelled them to speak in
21 violation of the First Amendment of the United States Constitution.

22 459. ~~338.~~ Defendants furthered no legitimate or compelling state
23 interest by engaging in this conduct.

24 460. ~~339.~~ Defendants failed to tailor their actions narrowly to
25 serve any such interest.

26 461. ~~340.~~ As a result of Defendants’ actions, Plaintiffs have been
27 injured by losing access to educational opportunities, losing access
28 to library and classroom facilities, losing in-person learning

opportunities, losing the ability to prepare for exams, being denied equal participation in the life of the university, suffering emotional and physical stress that has diverted time, attention, and focus from study, teaching, and research, and by other harms.

462. ~~341.~~—As a direct and proximate result of Defendants’ actions, Plaintiffs have suffered harm in the form of both general and special damages in an amount to be determined at trial, including but not limited to compensatory damages, punitive damages, and pre-judgment and post-judgment interest.

463. ~~342.~~—Absent injunctive and declaratory relief against Defendants, Plaintiffs will continue to be harmed by Defendants’ actions.

Count III

42 U.S.C. § 1983

Free Exercise Clause – Status Discrimination

464. ~~343.~~—Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

465. ~~344.~~—The Free Exercise Clause “protect[s] religious observers against unequal treatment” “based on their ‘religious status.’” *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 582 U.S. 449, 458 (2017) (quoting *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 533 (1993)).

466. ~~345.~~—Defendants deprived Plaintiffs of the free exercise of religion, as secured by the First Amendment, through policies and practices that subjected Plaintiffs to unequal treatment based on their religious status.

467. ~~346.~~—Defendants furthered no legitimate or compelling state interest by engaging in this conduct.

1 468. ~~347.~~ Defendants failed to tailor their actions narrowly to
2 serve any such interest.

3 469. ~~348.~~ As a result of Defendants' actions, Plaintiffs have been
4 injured by losing access to educational opportunities, losing access
5 to library and classroom facilities, losing in-person learning
6 opportunities, losing the ability to prepare for exams, being denied
7 equal participation in the life of the university, suffering emotional
8 and physical stress that has diverted time, attention, and focus from
9 study, teaching, and research, and by other harms.

10 470. ~~349.~~ As a direct and proximate result of Defendants'
11 actions, Plaintiffs have suffered harm in the form of both general
12 and special damages in an amount to be determined at trial,
13 including but not limited to compensatory damages, punitive
14 damages, and pre-judgment and post-judgment interest.

15 471. ~~350.~~ Absent injunctive and declaratory relief against
16 Defendants, Plaintiffs will continue to be harmed by Defendants'
17 actions.

Count IV
42 U.S.C. § 1983
Free Exercise Clause –
Not Generally Applicable: Unequal Treatment
of Comparable Activity

472. ~~351.~~ Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

473. ~~352.~~ The First Amendment provides that “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof.” U.S. Const. amend. I.

474. ~~353.~~ Under the Free Exercise Clause, a government action that burdens religious exercise triggers strict scrutiny when it is not neutral or generally applicable. *Fellowship of Christian Athletes v. San Jose Unified Sch. Dist. Bd. of Educ.*, 82 F.4th 664, 685 (9th Cir. 2023) (en banc).

475. ~~354.~~ A policy is not generally applicable if it treats “any comparable secular activity more favorably than religious exercise.” *Tandon v. Newsom*, 593 U.S. 61, 62 (2021) (per curiam).

476. ~~355.~~ Defendants treated Plaintiffs’ religious exercises, including wearing Jewish symbols and expressing support for Israel, less favorably than comparable secular activities.

477. ~~356.~~ Defendants furthered no legitimate or compelling state interest by engaging in this conduct.

478. ~~357.~~ Defendants failed to tailor their actions narrowly to serve any such interest.

479. ~~358.~~ As a result of Defendants’ actions, Plaintiffs have been injured by losing access to educational opportunities, losing access to library and classroom facilities, losing in-person learning opportunities, losing the ability to prepare for exams, being denied

1 equal participation in the life of the university, suffering emotional
2 and physical stress that has diverted time, attention, and focus from
3 study, teaching, and research, and by other harms.

4 480. ~~359.~~—As a direct and proximate result of Defendants’
5 actions, Plaintiffs have suffered harm in the form of both general
6 and special damages in an amount to be determined at trial,
7 including but not limited to compensatory damages, punitive
8 damages, and pre-judgment and post-judgment interest.

9 481. ~~360.~~—Absent injunctive and declaratory relief against
10 Defendants, Plaintiffs will continue to be harmed by Defendants’
11 actions.

12 **Count V**
13 **42 U.S.C. § 1983**

14 **Free Exercise Clause –**
15 **Not Generally Applicable: Discretionary Authority**

16 482. Plaintiffs incorporate by reference the allegations set forth
17 in the preceding paragraphs.

18 483. Government actions “burdening religious practice must be
19 of general applicability.” *Lukumi*, 508 U.S. at 542.

20 484. A policy is not generally applicable if it “invites the
21 government” to exercise “discretion” “to decide which reasons for not
22 complying with the policy are worthy of solicitude.” *Fulton v. City of*
23 *Philadelphia*, 593 U.S. 522, 537 (2021) (cleaned up); see also
24 *Fellowship of Christian Athletes*, 82 F.4th at 686-88.

25 485. Defendants have, and have exercised, “broad discretion” in
26 the administration of campus security including in addressing
27 issues of campus access.

28 486. Defendants possess, and at all relevant times did possess,
the discretion to request law enforcement’s assistance and

1 immediately terminate encampments formed on UCLA's campus
2 and other instances of antisemitism on campus.

3 487. Defendants and their agents made discretionary and
4 individualized judgments in choosing to allow activists to restrict
5 campus access to Jews while permitting others full and equal access
6 to campus.

7 488. Defendants exercised their discretion in choosing not to
8 enforce its policies related to nondiscrimination and campus access
9 against those who restricted campus access during the
10 encampments.

11 489. Defendants furthered no legitimate or compelling state
12 interest by engaging in this conduct.

13 490. Defendants failed to tailor their actions narrowly to serve
14 any such interest.

15 491. As a result of Defendants' actions, Plaintiffs have been
16 injured by losing access to educational opportunities, losing access
17 to library and classroom facilities, losing in-person learning
18 opportunities, losing the ability to prepare for exams, being denied
19 equal participation in the life of the university, suffering emotional
20 and physical stress that has diverted time, attention, and focus from
21 study, teaching, and research, and by other harms.

22 492. As a direct and proximate result of Defendants' actions,
23 Plaintiffs have suffered harm in the form of both general and special
24 damages in an amount to be determined at trial, including but not
25 limited to compensatory damages, punitive damages, and pre-
26 judgment and post-judgment interest.

1 493. Absent injunctive and declaratory relief against
2 Defendants, Plaintiffs will continue to be harmed by Defendants'
3 actions.

4 Count VI
5 42 U.S.C. § 1983

6 **Free Exercise Clause – Religious Targeting**

7 494. ~~361.~~ Plaintiffs incorporate by reference the allegations set
8 forth in the preceding paragraphs.

9 495. ~~362.~~ A law or policy “targeting religious beliefs as such is
10 never permissible.” Lukumi, 508 U.S. at 533.

11 496. ~~363.~~ Defendants targeted Plaintiffs’ Jewish religious beliefs
12 and practices for special disfavor in violation of the Free Exercise
13 Clause.

14 497. ~~364.~~ As a result of Defendants’ actions, Plaintiffs have been
15 injured by losing access to educational opportunities, losing access
16 to library and classroom facilities, losing in-person learning
17 opportunities, losing the ability to prepare for exams, being denied
18 equal participation in the life of the university, suffering emotional
19 and physical stress that has diverted time, attention, and focus from
20 study, teaching, and research, and by other harms.

21 498. ~~365.~~ As a direct and proximate result of Defendants’
22 actions, Plaintiffs have suffered harm in the form of both general
23 and special damages in an amount to be determined at trial,
24 including but not limited to compensatory damages, punitive
25 damages, and pre-judgment and post-judgment interest.

26 499. ~~366.~~ Absent injunctive and declaratory relief against
27 Defendants, Plaintiffs will continue to be harmed by Defendants’
28 actions.

Count ~~VI~~VII
42 U.S.C. § 2000d *et. seq.*

Title VI of the Civil Rights Act of 1964

500. ~~367.~~ Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

501. ~~368.~~ Title VI provides that “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d.

502. ~~369.~~ UCLA receives financial assistance from the United States Department of Education and is therefore subject to suit under Title VI of the Civil Rights Act of 1964.

503. ~~370.~~ Discrimination against Jews—including based on actual or perceived ancestry, race, ethnic characteristics, or national origin—is prohibited under Title VI. *Cf. Shaare Tefila Congregation v. Cobb*, 481 U.S. ~~at~~615, 616 (1987) (discrimination against Jews is discrimination based on race); *see also* 34 C.F.R. § 100.3(b)(1)(iv), (vi).

504. ~~371.~~ Defendants excluded Plaintiffs from participation in UCLA programs, denied Plaintiffs the full benefits of UCLA programs, and subjected Plaintiffs to discrimination, all in violation of Title VI.

505. ~~372.~~ As a result of Defendants’ actions, Plaintiffs have been injured by losing access to educational opportunities, losing access to library and classroom facilities, losing in-person learning opportunities, losing the ability to prepare for exams, being denied equal participation in the life of the university, suffering emotional

1 and physical stress that has diverted time, attention, and focus from
2 study, teaching, and research, and by other harms.

3 506. ~~373.~~—As a direct and proximate result of Defendants’
4 actions, Plaintiffs have suffered harm in the form of both general
5 and special damages in an amount to be determined at trial,
6 including but not limited to compensatory damages, punitive
7 damages, and pre-judgment and post-judgment interest.

8 507. ~~374.~~—Absent injunctive and declaratory relief against
9 Defendants, Plaintiffs will continue to be harmed by Defendants’
10 actions.

11 **Count ~~VH~~VIII**
12 **42 U.S.C. § 1985**
13 **Conspiracy to Interfere with Civil Rights**

14 508. ~~375.~~—Plaintiffs incorporate by reference the allegations set
15 forth in the preceding paragraphs.

16 509. ~~376.~~—Section 1985 of the Ku Klux Klan Act provides that “[i]f
17 two or more persons in any State or Territory conspire or go in
18 disguise on the highway or on the premises of another, for the
19 purpose of depriving, either directly or indirectly, any person or
20 class of persons of the equal protection of the laws, or of equal
21 privileges and immunities under the laws ... the party so injured or
22 deprived may have an action for the recovery of damages occasioned
23 by such injury or deprivation, against any one or more of the
24 conspirators.” 42 U.S.C. § 1985(3).

25 ~~377. Defendants conspired both among themselves and with the others~~
26 ~~for the purpose of depriving Plaintiffs of their constitutional rights and~~
27 ~~equal protection under the law, specifically access to all parts of the~~
28 ~~UCLA campus equal to the access enjoyed by others.~~

1 510. Defendants agreed to conspire with various activists inside
2 the April 2024 initial encampment for the purpose of depriving
3 Plaintiffs of their constitutional rights and equal protection of the
4 laws. Specifically, Defendants conspired with activists from the
5 encampment to deprive Plaintiffs of equal access to all parts of the
6 UCLA campus in violation of their constitutional rights to free
7 exercise and free speech and in violation of the equal protection of
8 the laws.

9 511. As Jews, Plaintiffs are members of a suspect class protected
10 by 42 U.S.C. § 1985(3). See *Shaare Tefila*, 481 U.S. at 617-18.

11 512. Defendants' agreement is manifested through various lines
12 of circumstantial evidence, including but not limited to Defendants'
13 statements that they actively chose not to involve police,
14 Defendants' erection of barricades to reinforce the encampment,
15 Defendants' refusal to take action irrespective of their direct
16 knowledge that encampment activists were using barricades to
17 exclude Jews from campus, Defendants' refusal to dismantle the
18 encampment regardless of their knowledge that Jewish students
19 and faculty like Plaintiffs could not pass through the encampment
20 without violating their religious beliefs or free speech rights,
21 Defendants' direction to security not to intervene to assist Jewish
22 students but instead to redirect them away from the encampment,
23 and Defendant Hunt's active negotiations with encampment
24 activists.

25 513. Defendants engaged in numerous acts in furtherance of this
26 conspiracy, including but not limited to setting up barricades to
27 reinforce the encampment, directing security not to intervene to
28 facilitate full and equal access by Jewish students, instructing

security to redirect Jewish students away from the encampment, and refusing to dismantle the encampment notwithstanding knowledge that Jewish students and faculty were being denied access to campus buildings and facilities.

514. These actions were motivated by discriminatory animus against Plaintiffs and other Jewish students and faculty.

515. 378.—As a result of Defendants’ actions, Plaintiffs have been injured by losing access to educational opportunities, losing access to library and classroom facilities, losing in-person learning opportunities, losing the ability to prepare for exams, being denied equal participation in the life of the university, suffering emotional and physical stress that has diverted time, attention, and focus from study, teaching, and research, and by other harms that violate their constitutional rights.

516. 379.—As a direct and proximate result of Defendants’ actions, Plaintiffs have suffered harm in the form of both general and special damages in an amount to be determined at trial, including but not limited to compensatory damages, punitive damages, and pre-judgment and post-judgment interest.

517. 380.—Absent injunctive and declaratory relief against Defendants, Plaintiffs will continue to be harmed by Defendants’ actions.

Count ~~VIII~~IX
42 U.S.C. § 1986

Failure to Prevent Conspiracy

518. 381.—Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

1 519. ~~382.~~ Section 1986 of the Ku Klux Klan Act provides “[e]very
2 person who, having knowledge that any of the wrongs conspired to
3 be done, and mentioned in section 1985 ... , are about to be
4 committed, and having power to prevent or aid in preventing the
5 commission of the same, neglects or refuses so to do, if such wrongful
6 act be committed, shall be liable to the party injured, or his legal
7 representatives, for all damages caused by such wrongful act, which
8 such person by reasonable diligence could have prevented.” 42
9 U.S.C. § 1986.

10 520. ~~383.~~ Section 1986 is, in other words, “derivative of § 1985
11 violations” and holds liable anyone who “knew of a § 1985 conspiracy
12 and, having the power to prevent or aid in preventing the
13 implementation of the conspiracy, neglected to do so.” Park v. City
14 of Atlanta, 120 F.3d 1157, 1160 (11th Cir. 1997). The statute does
15 not require the individual to have “participated in the conspiracy or
16 shared in the discriminatory animus with members of the
17 conspiracy.” Id.

18 521. ~~384.~~ Defendants knew of athe conspiracy to deprive
19 Plaintiffs of their civil rights.

20 522. ~~385.~~ Although Defendants had the power to prevent or aid
21 in preventing the implementation of the conspiracy, Defendants
22 neglected to do so in violation of Section 1986.

23 523. ~~386.~~ As a result of Defendants’ actions, Plaintiffs have been
24 injured by losing access to educational opportunities, losing access
25 to library and classroom facilities, losing in-person learning
26 opportunities, losing the ability to prepare for exams, being denied
27 equal participation in the life of the university, suffering emotional
28

1 and physical stress that has diverted time, attention, and focus from
2 study, teaching, and research, and by other harms.

3 524. ~~387.~~—As a direct and proximate result of Defendants’
4 actions, Plaintiffs have suffered harm in the form of both general
5 and special damages in an amount to be determined at trial,
6 including but not limited to compensatory damages, punitive
7 damages, and pre-judgment and post-judgment interest.

8 525. ~~388.~~—Absent injunctive and declaratory relief against
9 Defendants, Plaintiffs will continue to be harmed by Defendants’
10 actions.

11 **Count ~~IX~~X**
12 **California Constitution Art. I, § 7(a)**
13 **Equal Protection Clause**

14 526. ~~389.~~—Plaintiffs incorporate by reference the allegations set
15 forth in the preceding paragraphs.

16 527. ~~390.~~—Under California’s Equal Protection Clause, “[a]
17 person may not be ... denied equal protection of the laws.” Cal.
18 Const. art. 1, § 7(a). The Clause prohibits discrimination based on
19 race, ethnicity, and religion.

20 528. ~~391.~~—Defendants have deprived Plaintiffs of equal
21 protection of the laws, as secured by the California Constitution,
22 through policies and practices that treat Plaintiffs differently than
23 similarly situated individuals because Plaintiffs are Jewish.

24 529. ~~392.~~—Defendants furthered no legitimate or compelling state
25 interest by engaging in this conduct.

26 530. ~~393.~~—Defendants failed to tailor their actions narrowly to
27 serve any such interest.
28

531. ~~394.~~ As a result of Defendants' actions, Plaintiffs have been injured by losing access to educational opportunities, losing access to library and classroom facilities, losing in-person learning opportunities, losing the ability to prepare for exams, being denied equal participation in the life of the university, suffering emotional and physical stress that has diverted time, attention, and focus from study, teaching, and research, and by other harms.

532. ~~395.~~—As a direct and proximate result of Defendants’ actions, Plaintiffs have suffered harm in the form of both general and special damages in an amount to be determined at trial, including but not limited to compensatory damages, punitive damages, and pre-judgment and post-judgment interest.

533. ~~396.~~ Absent injunctive and declaratory relief against Defendants, Plaintiffs will continue to be harmed by Defendants' actions.

Count ~~XXI~~
California Constitution Art. I, § 4
Free Exercise Clause

534. ~~397.~~ Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

535. ~~398.~~ The California Constitution guarantees “[f]ree exercise and enjoyment of religion without discrimination or preference.” Cal. Const. art. I, § 4.

536. ~~399.~~—Defendants have deprived Plaintiffs of the free exercise and enjoyment of religion without discrimination or preference, as secured by the California Constitution, through a policy and practice that treats Plaintiffs differently than similarly situated non-Jewish individuals because Plaintiffs are Jewish.

1 537. ~~400.~~ Defendants furthered no legitimate or compelling state
2 interest by engaging in this conduct.

3 538. ~~401.~~ Defendants failed to tailor their actions narrowly to
4 serve any such interest.

5 539. ~~402.~~ As a result of Defendants' actions, Plaintiffs have been
6 injured by losing access to educational opportunities, losing access
7 to library and classroom facilities, losing in-person learning
8 opportunities, losing the ability to prepare for exams, being denied
9 equal participation in the life of the university, suffering emotional
10 and physical stress that has diverted time, attention, and focus from
11 study, teaching, and research, and by other harms.

12 540. ~~403.~~ As a direct and proximate result of Defendants'
13 actions, Plaintiffs have suffered harm in the form of both general
14 and special damages in an amount to be determined at trial,
15 including but not limited to compensatory damages, punitive
16 damages, and pre-judgment and post-judgment interest.

17 541. ~~404.~~ Absent injunctive and declaratory relief against
18 Defendants, Plaintiffs will continue to be harmed by Defendants'
19 actions.

20 **Count ~~XIX~~XII**
21 **Cal. Educ. Code § 220**
22 **Prohibition of Discrimination**

23 542. ~~405.~~ Plaintiffs incorporate by reference the allegations set
24 forth in the preceding paragraphs.

25 543. ~~406.~~ Section 220 of the California Education Code provides
26 that "[n]o person shall be subjected to discrimination on the basis
27 of ... race or ethnicity ... in any program or activity conducted by an
28 educational institution that receives, or benefits from, state

1 financial assistance, or enrolls pupils who receive state student
2 financial aid.” Cal. Educ. Code § 220.

3 544. ~~407.~~—UCLA both receives state financial assistance and
4 enrolls pupils who receive state student financial aid and is
5 therefore subject to suit under Section 220.

6 545. ~~408.~~—Section 220—as part of its prohibition of race
7 discrimination—prohibits discrimination against Jews. See Cal.
8 Educ. Code § 201(g) (“It is the intent of the Legislature that this
9 chapter shall be interpreted as consistent with ... Title VI of the
10 federal Civil Rights Act of 1964 ...”); *Shaare Tefila*, 481 U.S. at 616
11 (discrimination against Jews is discrimination based on race).

12 546. ~~409.~~—Defendants subjected Plaintiffs to discrimination on
13 the basis of Plaintiffs’ race or ethnicity in violation of California
14 Education Code § 220.

15 547. ~~410.~~—Defendants furthered no legitimate or compelling state
16 interest by engaging in this conduct.

17 548. ~~411.~~—Defendants failed to tailor their actions narrowly to
18 serve any such interest.

19 549. ~~412.~~—As a result of Defendants’ actions, Plaintiffs have been
20 injured by losing access to educational opportunities, losing access
21 to library and classroom facilities, losing in-person learning
22 opportunities, losing the ability to prepare for exams, being denied
23 equal participation in the life of the university, suffering emotional
24 and physical stress that has diverted time, attention, and focus from
25 study, teaching, and research, and by other harms.

26 550. ~~413.~~—As a direct and proximate result of Defendants’
27 actions, Plaintiffs have suffered harm in the form of both general
28 and special damages in an amount to be determined at trial,

1 including but not limited to compensatory damages, punitive
2 damages, and pre-judgment and post-judgment interest.

3 551. ~~414.~~ Absent injunctive and declaratory relief against
4 Defendants, Plaintiffs will continue to be harmed by Defendants'
5 actions.

6 **Count ~~XIX~~XIII**
7 **Cal. Civil Code § 51.7**
8 **Ralph Civil Rights Act of 1976**

9 552. ~~415.~~ Plaintiffs incorporate by reference the allegations set
10 forth in the preceding paragraphs.

11 553. ~~416.~~ The Ralph Civil Rights Act of 1976 provides that “[a]ll
12 persons within the jurisdiction of this state have the right to be free
13 from any violence, or intimidation by threat of violence, committed
14 against their persons or property because of” race or ethnicity. Cal.
15 Civ. Code § 51.7(b)(1).

16 554. ~~417.~~ Defendants allowed activists to harass, threaten, and
17 assault Plaintiffs because of their Jewish identity in violation of the
18 Ralph Civil Rights Act.

19 555. ~~418.~~ Defendants furthered no legitimate or compelling state
20 interest by engaging in this conduct.

21 556. ~~419.~~ Defendants failed to tailor their actions narrowly to
22 serve any such interest.

23 557. ~~420.~~ As a result of Defendants’ actions, Plaintiffs have been
24 injured by losing access to educational opportunities, losing access
25 to library and classroom facilities, losing in-person learning
26 opportunities, losing the ability to prepare for exams, being denied
27 equal participation in the life of the university, suffering emotional
28

1 and physical stress that has diverted time, attention, and focus from
2 study, teaching, and research, and by other harms.

3 558. ~~421.~~—As a direct and proximate result of Defendants’
4 actions, Plaintiffs have suffered harm in the form of both general
5 and special damages in an amount to be determined at trial,
6 including but not limited to compensatory damages, punitive
7 damages, and pre-judgment and post-judgment interest.

8 559. ~~422.~~—Absent injunctive and declaratory relief against
9 Defendants, Plaintiffs will continue to be harmed by Defendants’
10 actions.

11 **Count ~~XIII~~XIV**
12 **Cal. Civil Code § 52.1**
13 **Tom Bane Civil Rights Act**

14 560. ~~423.~~—Plaintiffs incorporate by reference the allegations set
15 forth in the preceding paragraphs.

16 561. ~~424.~~—The Tom Bane Civil Rights Act provides a right of
17 action against any “person or persons, whether or not acting under
18 color of law, [who] interferes by threat, intimidation, or coercion, or
19 attempts to interfere by threat, intimidation, or coercion, with the
20 exercise or enjoyment by any individual or individuals of rights
21 secured by the Constitution or laws of the United States, or of the
22 rights secured by the Constitution or laws of [California].” Cal. Civil
23 Code § 52.1(b).

24 562. ~~425.~~—Defendants interfered by threat, intimidation, or
25 coercion, with Plaintiffs’ exercise or enjoyment of rights secured by
26 the Constitution or laws of the United States and rights secured by
27 the Constitution or laws of California.
28

1 563. ~~426.~~ Defendants furthered no legitimate or compelling state
2 interest by engaging in this conduct.

3 564. ~~427.~~ Defendants failed to tailor their actions narrowly to
4 serve any such interest.

5 565. ~~428.~~ As a result of Defendants' actions, Plaintiffs have been
6 injured by losing access to educational opportunities, losing access
7 to library and classroom facilities, losing in-person learning
8 opportunities, losing the ability to prepare for exams, being denied
9 equal participation in the life of the university, suffering emotional
10 and physical stress that has diverted time, attention, and focus from
11 study, teaching, and research, and by other harms.

12 566. ~~429.~~ As a direct and proximate result of Defendants'
13 actions, Plaintiffs have suffered harm in the form of both general
14 and special damages in an amount to be determined at trial,
15 including but not limited to compensatory damages, punitive
16 damages, and pre-judgment and post-judgment interest.

17 567. ~~430.~~ Absent injunctive and declaratory relief against
18 Defendants, Plaintiffs will continue to be harmed by Defendants'
19 actions.

20 **PRAYER FOR RELIEF**

21 Wherefore, Plaintiffs respectfully request that the Court:

22 568. ~~a.~~ Declare that Defendants have violated the First and
23 Fourteenth Amendments to the United States Constitution, Title VI
24 of the Civil Rights Act of 1964, Sections 1983, 1985, and 1986 of the
25 Ku Klux Klan Act, the California Constitution, the California
26 Education Code, the Ralph Civil Rights Act of 1976, and the Tom
27 Bane Civil Rights Act;
28

1 569. ~~b.~~—Issue preliminary and permanent injunctive relief
2 prohibiting Defendants’ unequal treatment of Plaintiffs in violation
3 of Plaintiffs’ constitutional and statutory rights;

4 570. ~~e.~~—Award Plaintiffs compensatory, punitive, and nominal
5 damages for the loss of their rights under federal and state law;

6 571. ~~d.~~—Award Plaintiffs the costs of this action and reasonable
7 attorneys’ fees; and

8 572. ~~e.~~—Award such other and further relief as the Court deems
9 equitable and just.

10 **JURY DEMAND**

11 Plaintiffs request a trial by jury on all issues so triable.
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1 Dated: ~~June 5~~October 22, 2024

Respectfully submitted,

2 /s/ Eric C. Rassbach

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